GREEN STRATEGIES

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HOW SCOPE 2 REVISIONS MAY CHANGE CLEAN ELECTRICITY PROCUREMENT STRATEGIES

Insights from Corporate Practitioners

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EXECUTIVE SUMMARY

Hundreds of companies procure clean electricity to meet their climate and other business goals using the 2015 GHG Protocol Scope 2 Guidance to account for their procurements. The Scope 2 Guidance is undergoing its first revision in a decade, with the potential to significantly impact corporate clean electricity procurement strategies around the world.

A wide range of stakeholders – including academics, practitioners, and NGOs – have proposed changes to Scope 2 accounting rules. These proposals tend to make explicit or implicit assumptions about how companies would respond to such changes without any direct data to justify those assumptions. This first-of-its-kind survey aims to fill this gap, providing aggregated results and unique company insights on how different Scope 2 Guidance revision proposals may alter corporate clean electricity procurement strategies.

The Green Strategies team surveyed companies active in corporate clean electricity procurement markets around the world in late 2024 and early 2025, asking them nearly two dozen questions about how their existing practices and strategies might change under three leading Scope 2 Guidance revision scenarios.

Key findings include:

- Seventy percent of respondents indicate they have current procurement contracts that would no longer be eligible under smaller market boundaries (balancing authorities or bidding zones), which threatens their ability to achieve current and future corporate clean electricity targets.
- Companies operating in grids without wholesale markets or retail choice are most concerned with the potential of smaller market boundaries.
- Nearly 80% of respondents lack confidence that they would be able to procure time-matched clean electricity within smaller market boundaries.
- Respondents are split on whether they would increase their existing engagement with utilities or energy policy initiatives to increase local clean electricity sourcing options.
- Most companies say that the flexibility to procure outside of existing market boundaries would allow them to increase the carbon reduction impact of their clean electricity procurements where they otherwise could not.

The survey results make clear that all three proposed scenario changes would impact the purchasing behavior of corporate electricity consumers.

INTRODUCTION AND SURVEY DESCRIPTION

Over four hundred companies have committed to procuring clean electricity to meet their sustainability goals.[1,2] Since 2008, corporations have announced clean electricity power purchase agreements, or PPAs, for 198 gigawatts – greater than the power generation capacity of countries like France, the United Kingdom, and South Korea.[3] In the United States alone, corporate contracts represented 40% of all clean electricity generation capacity added to the grid in the last decade.[4]

These procurements were enabled, in part, by the clarity provided in the 2015 GHG Protocol Scope 2 Guidance ("Scope 2 Guidance"). The Scope 2 Guidance defines accounting requirements for incorporating electricity environmental attribute certificates (EACs) and other transactions for clean electricity in corporate Scope 2 GHG inventories. The Scope 2 Guidance is currently undergoing its first revision process, with an initial draft expected for public review in late 2025.[5]

A wide range of stakeholders – including academics, practitioners, and NGOs – have proposed changes to Scope 2 accounting rules. A number of these stakeholders and others have attempted to evaluate potential electric system impacts stemming from specific Scope 2 accounting revision proposals.[6] These studies often make significant assumptions regarding market behavior. However, there is little to no research examining how the buyer side of the market – specifically, the companies procuring clean electricity – may change behavior under different accounting revisions.[7] Understanding how energy customer behavior might change is critical to evaluating the efficacy of accounting revision proposals for their stated decarbonization goals and theories of change.

To fill this gap, Green Strategies, a firm with more than two decades of expertise in voluntary clean electricity markets, developed a detailed survey to assess existing corporate clean electricity procurement strategies and how potential Scope 2 changes may influence procurement decision-making.

SURVEY DESIGN AND DISTRIBUTION

The survey team reviewed Scope 2 accounting revision proposals submitted to the GHG Protocol in its 2022 - 2023 public input process.[8] Based on those proposals, the team constructed three scenarios to reflect the common revision proposal elements submitted to GHG Protocol.

- **Scenario 1**: Market boundaries change from primarily country-level boundaries to balancing authority or bidding zones.
- **Scenario 2**: Market boundaries change as described in Scenario 1 (smaller) and companies are required to match their electricity consumption with clean electricity on an hourly basis ("hourly" or "time" matching).
- **Scenario 3**: Existing, broad market boundaries remain the same, and companies must also calculate and report on displaced emissions from their additional procured clean electricity.

The survey asked companies to consider how their current clean electricity procurement strategies may change under each of the three scenarios. Regarding the proposed changes to market boundaries in Scenarios 1 and 2, the survey presented information on how current market boundaries in the United States and Europe would change. This information was shared to garner more useful and less theoretical responses from practitioners and to reflect that most of the specific proposals on market boundary changes have focused on the United States and Europe.

Since the accounting elements of Scenarios 1 and 2 are similar (except for the hourly-matching element), the survey questions for these scenarios focused on different potential procurement impacts of changing market boundary conditions (Scenario 1) and time (Scenario 2) to avoid respondent confusion and ensure useful results. A comparison of the three scenarios by key GHG accounting elements is included in Table 1.

The survey included multiple choice and optional, open-ended response options. As clear terminology and definitions were critical for the survey to produce consistent results, all participants were provided with a glossary of key terms. The survey did not include questions on the availability of accounting method data and calculation feasibility, nor did it ask a company for its opinions of the value of a given scenario. Survey questions and glossary are available here.

Green Strategies developed and released the survey to 90 companies and industry associations with large users of electricity in November 2024. The survey response period concluded at the end of February 2025, and results were analyzed in March 2025.

REPORT STRUCTURE

The report's sections present information on survey participant demographics, information on the company's current clean electricity procurement methods, and key survey findings for each scenario. Each scenario section also includes some of the optional, free-form responses that companies provided in their submissions; these responses are labeled as "insights." The insights are copied verbatim, except for when the response included potential company identifiers, or when the response is unclear without additional explanation. In those instances, the Green Strategies team removed company-specific identifiers and used bracketed text to add context and clarity as required.

Table 1. Comparison of Key Elements of Current Scope 2 Market-Based Accounting and Survey Scenarios

Scenario Element	Current Scope 2 Market Based Accounting[9]	Scenario 1	Scenario 2	Scenario 3
Market Boundaries for Eligible Clean Electricity Procurement	National borders, except for: • U.S. and Canada are a single market per RE100. • EU/AIB member countries are a single market per RE100.	Balancing authority or regional transmission organization (within the U.S. and Canada). Transmission system operators / bidding zones (within Europe).	Same as Scenario 1.	No market boundary. Displaced emissions are calculated separately from load emissions.
Time Matching	"As close as possible." In practice, annual matching is generally performed.	Same as current Scope 2 market-based accounting.	Hourly requirement.	Unspecified. Proposals include temporal data hierarchies.
Additionality Requirement	No	No	No	Yes

SURVEY RESULTS

PARTICIPANT DEMOGRAPHICS & CURRENT PROCUREMENT METHODS

Corporate procurement practitioners from 23 companies completed the survey. Collectively these companies exceed over $5 trillion in valuation and have headquarters across Europe, Asia, and North America. In addition, most (89%) of the responding companies operate more than 20 facilities, with roughly half (56%) operating facilities in 20 or more countries.

Responding companies operate in five different primary sectors with technology and manufacturing most represented, followed by real estate/investing, retail, and food/agriculture, with a range of facilities globally (Figures 1 and 2).

The survey listed five clean electricity transaction types that companies use in their procurement strategies. These 'procurement types' are defined in the survey glossary.

Using these definitions, 65% of companies report that they use at least four of the five procurement types in their current procurement strategies. Onsite generation and VPPAs are the most commonly-used procurement types, while competitive supplier agreements are the least common. Figure 3 identifies the percentage of respondents using multiple procurement types in their procurement strategies.

Figure 1. Respondents by sector

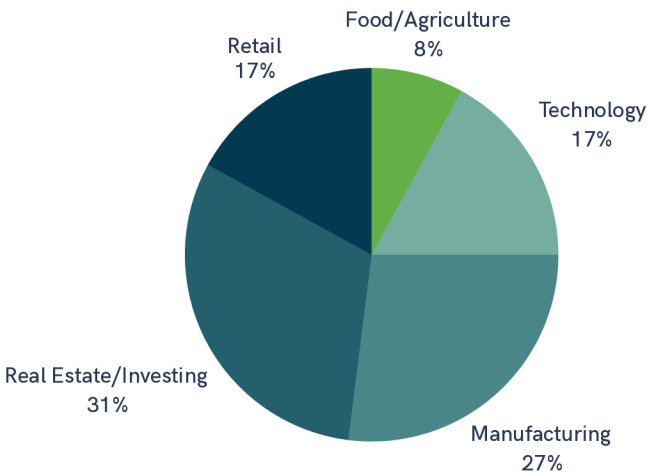
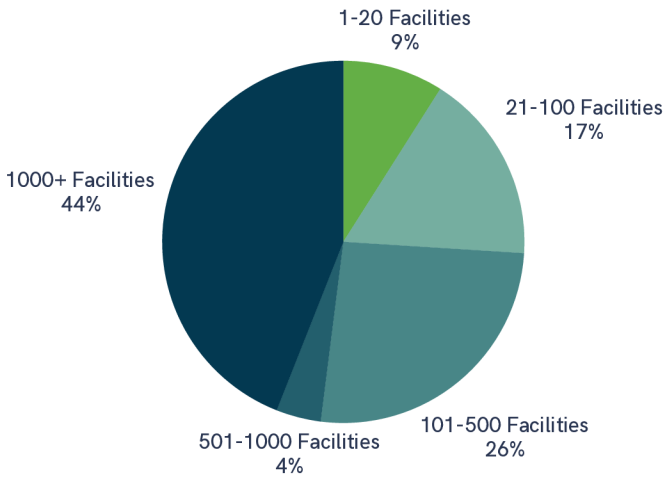


Figure 2. Respondents by number of corporate facilities

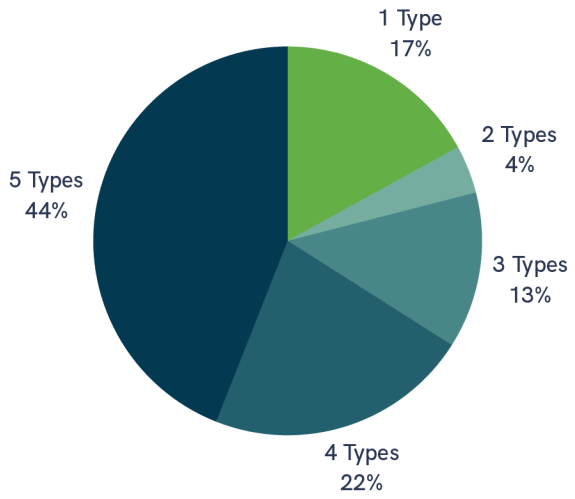


IMPACTS OF SMALLER MARKET BOUNDARIES (SCENARIO 1)

The survey asked respondents about the potential impacts from reducing the size of market boundaries in the Scope 2 market-based accounting method.

Proponents of smaller market boundaries suggest that such market boundaries could improve the accuracy of market-based accounting by creating a stronger geographic relationship to the company's electricity consumption and the mix of electric generators that provide the physical electricity supply. Proponents also suggest that smaller market boundaries may incentivize companies to work with electricity suppliers and policymakers to improve access to clean electricity procurement in grids where that remains a challenge today.

Figure 3. Respondents using one or more procurement type



IMPACTS OF SMALLER MARKET BOUNDARIES ON EXISTING CONTRACTS

The survey asked companies how changes to the Scope 2 Guidance's market boundaries might impact the value of existing procurement agreements. For example, consider a company that signed a 15-year VPPA for a clean electricity project located in the same existing market boundary where the company has substantial electricity consumption. If market boundaries change in a way that the project is no longer in the same market boundary as the company's electricity consumption, the GHG accounting value of the VPPA to the company would decrease.

To assess this possibility, the survey asked companies if any of their existing procurements may be in a different market boundary as their electricity consumption under Scenario 1 market boundary proposals. The survey found that 70% of respondents who have current procurement contracts would no longer be eligible under Scenario 1 because at least part of the company's electricity consumption covered by the procurement would be in a different market boundary (Figure 4).

Independent of Scenario 1 proposed changes, the survey found that companies are already prioritizing "in grid" clean electricity sourcing in their current procurement strategies. Roughly a third (31%) of respondents report that procuring in the same balancing authority/wholesale market (U.S.) or national boundary (Europe) is a high priority for their company, while another 50% of respondents indicated such geographic proximity is important (though not a priority) for them (Figure 5).

Figure 4. Percent of respondents with existing procurements that may be not eligible under smaller market boundaries

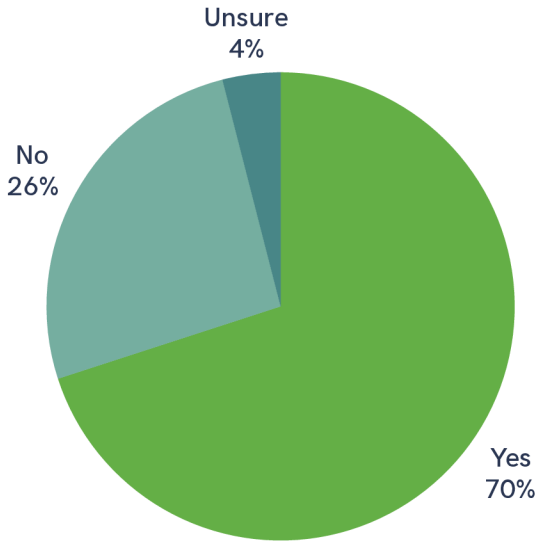
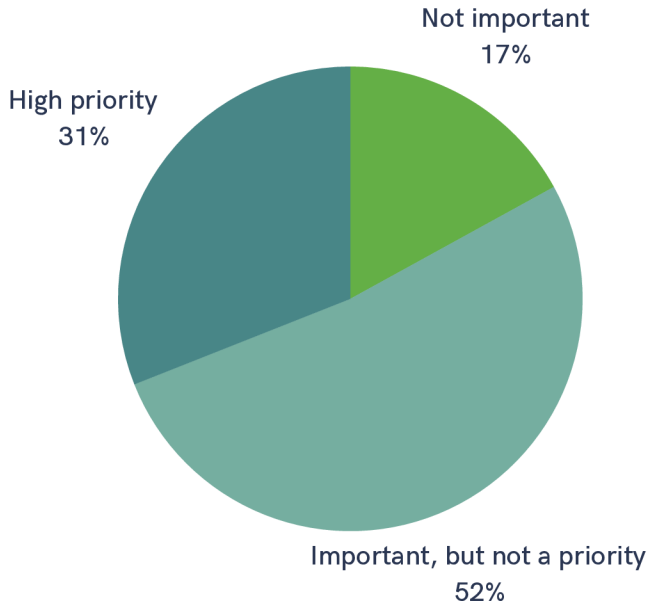


Figure 5. Respondents prioritizing current clean electricity procurements within the same grid as their facilities



IMPACTS OF SMALLER MARKET BOUNDARIES IN DIFFERENT GRID REGULATORY STRUCTURES

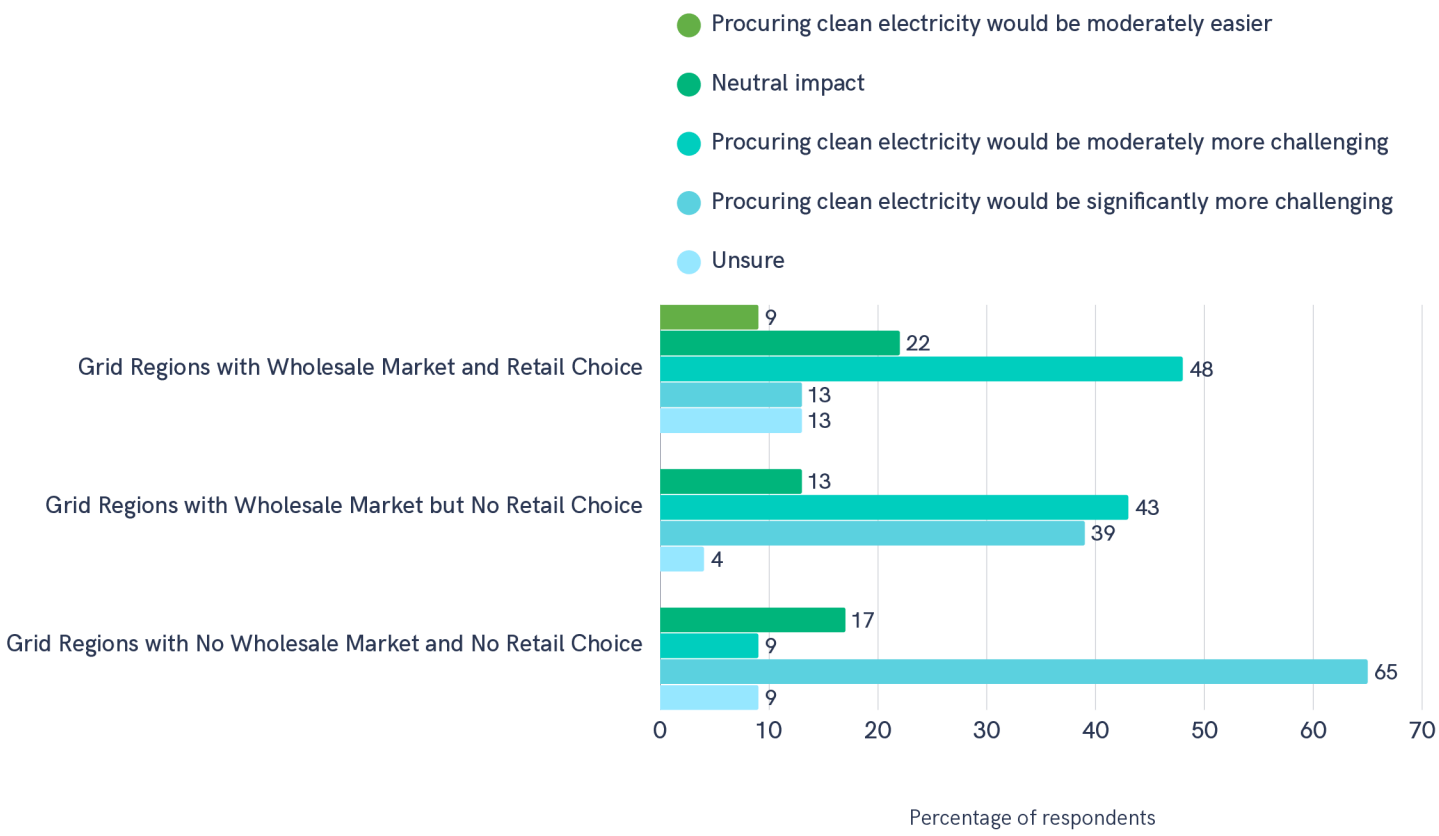
The survey asked respondents to consider how smaller market boundaries may impact their company's ability to procure clean electricity in three different electric grid regulatory structures: **(1) Regulated (no retail choice) regions without wholesale electric markets** (*e.g.*, the Pacific Northwest and Southeastern United States); **(2) Regulated regions with wholesale markets** (*e.g.*, most of the Midcontinent Independent System Operator (MISO) region in the United States); and **(3) Retail choice with wholesale markets** (*e.g.*, most of the PJM region in the United States, most countries in Europe).

Our analysis concluded three main takeaways regarding the impact of smaller market boundaries on clean electricity procurement:

- Smaller market boundaries present the biggest procurement challenge in regions with no retail choice or wholesale markets. Nearly two-thirds (65%) of respondents indicate that sourcing eligible procurement would become significantly more difficult;
- Procuring in regions that have wholesale electric markets but no retail choice would be significantly (39%) or moderately more difficult (43%); and
- Procurement in markets with retail choice and wholesale markets is expected to be less challenging than in other markets. Roughly 60% of respondents report that procurement would be significantly or moderately more difficult in these regions, while 9% expect procurement to become moderately easier in these markets.

More data on the impact of smaller market boundaries varies by grid regulatory structure is presented in Figure 6 below.

Figure 6. Impact of smaller market boundaries on procurement access by grid regulatory structure



IMPACT OF SMALLER MARKET BOUNDARIES ON UTILITY AND POLICYMAKER ENGAGEMENT

The survey asked companies how Scenario 1 would impact their engagement with policymakers on energy policy topics such as expanding wholesale markets. Nearly 75% of respondents indicate that their company would not increase – or were unsure if their company would increase – their engagement with policymakers in expanding wholesale markets if Scenario 1 were adopted (Figure 7).

Respondents are more optimistic about engaging with utilities on expanding clean electricity procurement opportunities. If Scenario 1 were adopted, nearly half of respondents expect that their company would increase engagement with utilities to increase access to clean electricity (Figure 8). Among the companies reporting that they will not increase utility engagement levels under Scenario 1, several noted that they are already working with their utilities to increase access to clean electricity, and they do not expect changes to GHG accounting rules to alter the importance of such engagement.

Figure 7. Percentage of companies that would increase policymaker engagement on wholesale market expansion and clean electricity policies under smaller market boundaries

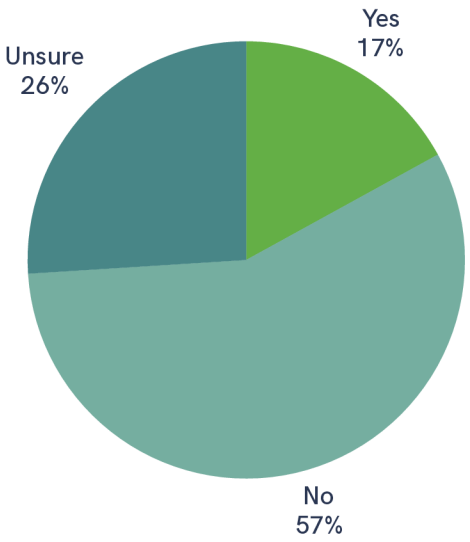
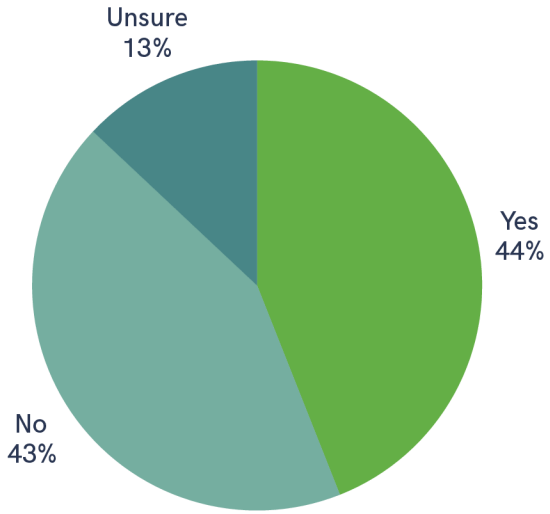


Figure 8. Percentage of companies that would increase incumbent utility engagement on clean electricity procurement options under smaller market boundaries



SCENARIO 1 RESPONDENT INSIGHTS

IMPACTS TO EXISTING PROCUREMENT

"None of our current contracts would be impacted. This is because our earliest contracts have been on grids where our load is the most significant. Scenario 1 would *very* significantly impact our ability to deeply decarbonize the rest of our portfolio." -Technology Company

"We have already over-procured in certain U.S. ISOs, so this change would prevent any future procurement in these regions." -Technology Company

"More than half - if not most - of our contracted renewable energy would no longer be eligible for inclusion if market boundaries are narrowed." -Technology Company

"We have existing PPAs in Europe that we signed under the assumption that we could allocate the PPA volumes across production sites in multiple European countries." -Food & Agriculture Company

IMPACTS TO FUTURE PROCUREMENT - ACROSS GRID REGULATORY STRUCTURES

"Regardless of access, the market boundary scenario [Scenario 1] severely constrains our ability to procure in an impactful manner…By tightening market boundaries, we lose the ability to aggregate load and we'll be working with much smaller supply volumes, making impact procurements challenging/near impossible" -Technology Company

"We would delay seeking procurement for locations under certain market structures unless utilities offer compelling green offerings." -Retail Company

"We have a significant number of facilities in locations without wholesale markets and without retail choice. We would not be able to green these facilities." -Food & Agriculture Company

POLICYMAKER AND UTILITY ENGAGEMENT

"We would aim to increase our engagement, but proponents of narrower market boundaries need to understand that our company has limited bandwidth to do advocacy. We would have to pick and choose where we are active. We cannot be everywhere at all times." -Food & Agriculture Company

"[Smaller market boundaries] would force us to work with utilities, which have not historically been willing to offer low-cost solutions at a scale or speed meaningful to our objectives." -Technology Company

"We do not have a budget for [policy or utility engagement] and are a company that shies away from advocacy, especially on issues that are not core to our business. We would see a scaling back of commitment, rather than an increase in advocacy." -Food & Agriculture Company

IMPACTS OF SMALLER MARKET BOUNDARIES WITH HOURLY TIME MATCHING (SCENARIO 2)

SCENARIO 2 DESCRIPTION

The survey asked respondents to consider a scenario in which the smaller market boundaries of Scenario 1 are combined with hourly time-matching requirements. The survey informed respondents that some proponents of such changes suggest that this approach could encourage companies to procure clean electricity that coincides with the company's electricity consumption, shift consumption patterns, and encourage procurement of firm and dispatchable clean electricity.

IMPACTS TO EXISTING PROCUREMENTS

Respondents were asked if there are times of the year (seasons or particular hours) when the volume of their contracted clean electricity exceeds their total electricity consumption occurring within the same hour or the same (smaller) market boundary. More than two-thirds (69%) of respondents have existing procurements with periods of such surplus, while the rest of respondents are either unsure or report that such a scenario solution is "not likely."

IMPACTS ON FUTURE PROCUREMENT AVAILABILITY

Respondents were asked how confident they were that they could source time-matched clean electricity within the smaller market boundaries. Approximately three-quarters (78%) of respondents are not confident that they would be able to source clean electricity eligible under Scenario 2, while 17% are confident (either mildly or highly confident) that they could source sufficient volumes of eligible electricity (Figure 9).

PROCURING FIRM AND DISPATCHABLE CLEAN ELECTRICITY

The survey probed whether, under Scenario 2, companies would procure more "firm and dispatchable clean electricity." The survey defined such electricity as generation resources that grid operators can call on anytime and which can provide supply for relatively long periods of time, such as days and even weeks. To test this theory, the survey asked if companies currently procure firm and dispatchable clean electricity in their portfolios, and how Scenario 2 would impact their procurement of these resources.

A quarter (26%) of respondents report that their company currently procures clean electricity from firm and dispatchable resources within their existing portfolio, while the remainder say they have not procured these resources (61%) or are unsure (13%). When asked if their company would increase the procurement of firm and dispatchable clean electricity under Scenario 2, 39% of respondents indicate they would if additional costs were minimal or none; 22% of respondents indicate they would increase firm and dispatchable procurement regardless of cost. Conversely, 13% of respondents note that Scenario 2 proposals would not impact their decision, as their company's procurement of clean firm and dispatchable resources is currently driven by non-carbon accounting impacts, and roughly a quarter of respondents are unsure or simply said "No" (Figure 10).

Figure 9. Respondent's confidence level on sourcing clean electricity under Scenario 2

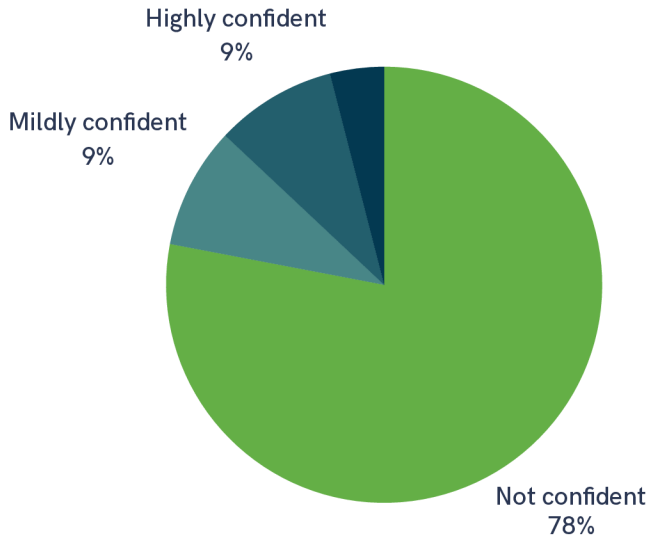
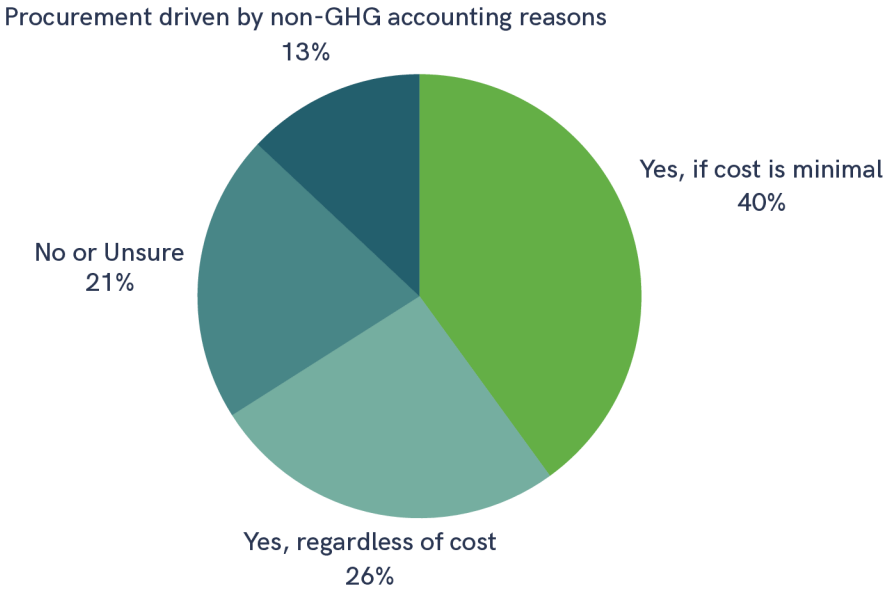


Figure 10. Respondent's likelihood of increasing firm and dispatchable procurement under Scenario 2



SCENARIO 2
RESPONDENT INSIGHTS

TIMES OF SURPLUS GENERATION FROM EXISTING PROCUREMENT

"We have a [Scenario 2] retail agreement that is asset specific. It over-produces many hours." -Technology Company

"Yes, there will almost always be an hourly mismatch." -Food & Agriculture Company

PROCUREMENT FEASIBILITY AND CORPORATE RESOURCING

"Highly confident [that we could meet requirement under Scenario 2] in competitive markets, dependent on utility data and programs in captive markets." -Real Estate Company

"This would likely lead to significant cost increases and significant additional time needed to negotiate PPAs and purchase certificates." -Food & Agriculture Company

"Annual matching is difficult enough for our executives to understand. Getting support for hourly matching would be a year - minimum - possibly never, given the costs." -Technology Company

"If there was a requirement for more rigorous time matching, engaging with suppliers would be necessary." -Retail Company

PROCURING FIRM AND DISPATCHABLE CLEAN ELECTRICITY

"[Procuring firm and dispatchable clean electricity] would depend on other factors such as supply availability, costs, etc." -Food & Agriculture Company

"We are, and have been, procuring these resources already. So, the Scenario 2 change is unlikely to drastically change our behavior." -Technology Company

IMPACTS OF CHANGES TO IMPACT ACCOUNTING (SCENARIO 3)

SCENARIO 3 DESCRIPTION

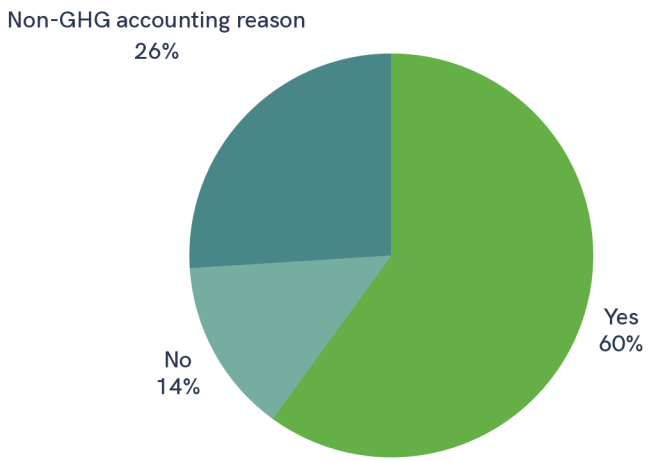
In Scenario 3, companies were presented with an electricity GHG accounting system scenario that allows clean electricity procurement outside of the current market boundaries. Eligible procurement in Scenario 3 would need to meet additionality requirements.[10] Emissions displaced from procurements under Scenario 3 would be calculated and reported next to, but separately from, the company's electricity consumption emission results. This type of accounting approach is sometimes referred to as emissionality, carbon-matching accounting, or impact accounting.

The survey informed respondents that proponents of Scenario 3 proposals believe it will help companies overcome barriers to procuring clean electricity in countries in which they have electricity consumption but where they face significant regulatory and other barriers to procurement (*e.g.*, no retail competition or wholesale markets). Some proponents also say Scenario 3 may encourage more investment in clean electricity projects outside of the United States and Europe.[11]

IMPACTS ON FUTURE PROCUREMENT AVAILABILITY

Respondents were asked if, given the opportunity to count eligible clean electricity sources generated outside the existing market boundaries their loads are in, would they consider procuring such clean electricity sources. Approximately 60% of respondents say that they would procure outside of existing market boundaries stating reasons such as procurement opportunities outside some of their current market boundaries would displace more GHG emissions (*e.g.*, they operate in relatively clean grids currently), or because the companies operate within current market boundaries where voluntary procurement is not available or very limited.[12] A quarter of companies (26%) note that there are non-GHG accounting reasons they prefer to source in the regions or countries they operate in, so they are either less likely or unlikely to procure outside of their current market boundaries. The remaining respondents indicate that they would not procure outside of existing market boundaries (Figure 11).

Figure 11. Respondents that would procure outside of existing market boundaries if allowed



ADDITIONALITY REQUIREMENTS IN SCENARIO 3

The survey asked companies if they would include additionality requirements in their procurement strategy if those requirements enabled procurement outside of existing market boundaries. The survey found that most respondents (70%) either already include additionality requirements or preferences in their procurement strategies, or they would add such requirements in order to procure in other markets consistent with Scenario 3. The remaining 30% of respondents report that they would not add additionality requirements in exchange for more market procurement options, or that they are unsure (Figure 12).

CHANGES TO PROCUREMENT VOLUMES

Some proponents of impact accounting methods believe that companies may procure either a larger volume of clean electricity, or clean electricity that reduces greater levels of GHG emissions as compared to options within their existing market boundaries, if such procurement was recognized in corporate GHG accounting and target setting systems. To test this belief, the survey asked participants how Scenario 3 changes would impact the volume of clean electricity they may procure. Approximately a quarter of respondents (22%) indicate that they would procure more clean electricity under Scenario 3, while half would procure the same volumes as they do today. The remaining respondents indicate they are unsure what they would do (Figure 13).

Figure 12. Respondents on if they would add additionality requirements in their procurement strategies to procure outside existing market boundaries

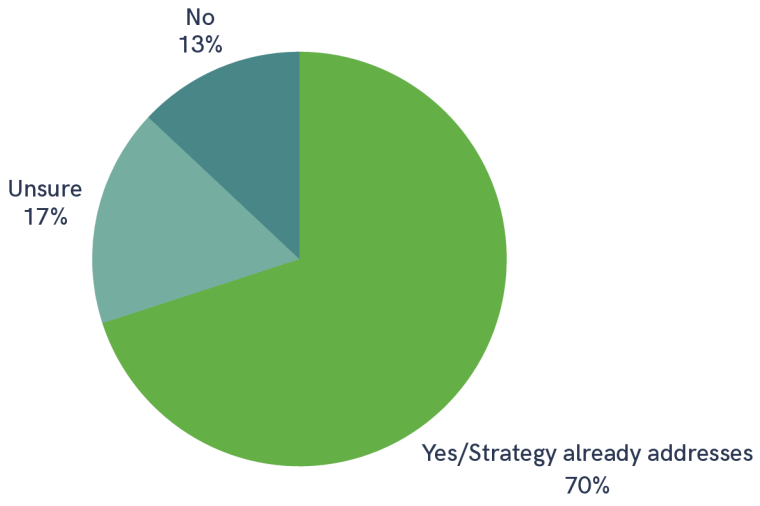
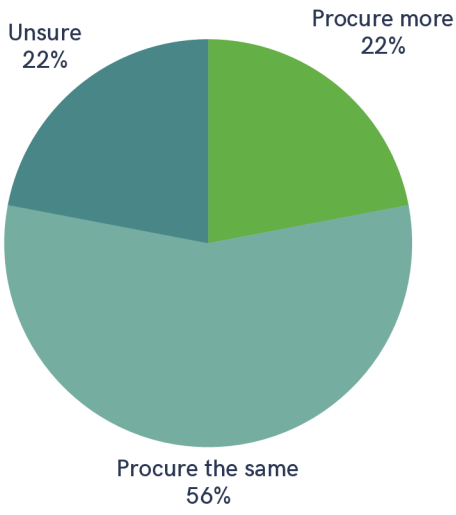


Figure 13. Scenario 3's potential impact on overall volume of clean electricity procured



SCENARIO 3
RESPONDENT INSIGHTS

MARKETS WHERE PROCUREMENT IS CHALLENGING

"We operate in certain countries where there are not feasible voluntary options to procure clean electricity." -Retail Company

"There are markets where it is not possible to purchase renewable electricity today, or where the buildout of renewable electricity supply is leading to severe congestion issues where renewable projects are competing with each other for transmission and distribution capacity." -Food & Agriculture Company

"We have intentionally located ourselves in markets to achieve our energy reduction goals." -Technology Company

ON ADDITIONALITY REQUIREMENTS

"We tie all clean energy procurements to additional clean generation that we have enabled through procurement or investment." -Retail Company

"Additionality is not a credible attribute for an energy buyer to claim and should not be used to measure clean energy procurement." -Technology Company

"We have an additionality preference, but additionality is extremely hard to define; I wouldn't support adding this requirement. There are also scenarios where purchasing from an existing renewable asset is important for that project to continue operating." -Food & Agricutlure Company

POTENTIAL IMPACT OF SCENARIO 3

"We would be able to initiate strategies to address our global load more comprehensibely [if Scenario 3 were recognized]." -Retail Company

"[Scenario 3] would be an enabling approach. It would offer cost-efficient optionality to make near-term purchases that otherwise would not be possible. Importantly, it would incentivize procurement in places that have high-potential decarbonization benefit." -Food & Agriculture Company

CONCLUSION

Carbon accounting proposals often have different theories of change for the best ways to optimize voluntary investment in clean electricity. Testing the different proposals with end-user companies can help understand the efficacy of carbon accounting theories.

Narrowing market boundaries (Scenario 1) would likely make clean energy more difficult for the majority of respondents. Likewise, companies currently lack confidence that they would be able to successfully procure clean electricity within smaller market boundaries *and* meet time-matching requirements (Scenario 2). These changes would make procurement harder and slower.

Most respondents indicate that the flexibility provided by more open market boundaries would allow them to increase their carbon reduction impact or procure clean energy when they otherwise could not. The vast majority of respondents are supportive of additionality requirements for procurements outside of existing market boundaries.

This survey is a first step to understanding end-customers' potential changes in behavior. Additional implementation research is needed on how company strategies may change due to carbon accounting reforms.

KEY TAKEAWAYS

Smaller Market Boundaries

- Nearly two-thirds (65%) of respondents indicate that sourcing eligible procurements in grids without wholesale electricity markets or retail choice would become significantly more difficult in markets if smaller market boundaries were adopted.
- Respondents are split on how Scope 2 revisions would influence their energy policy engagement. Half of respondents would likely increase their work with ***utilities*** on local sourcing options if market boundary sizes decreased; while a majority (75%) say they are uncertain or would not increase their engagement with ***policymakers*** on wholesale market expansion and clean electricity policy under smaller market boundaries.

Smaller Market Boundaries & Time Matching

- Smaller market boundaries, combined with hourly time-matching requirements, may incentivize companies to procure clean electricity from firm and dispatchable resources. Approximately two-thirds of respondents expressed interest in increasing procurement of these sources under this scenario (with varying levels of cost sensitivity reported).

Change to Impact Accounting

- Approximately 60% of respondents indicate that the flexibility to procure outside of existing market boundaries would allow them to increase the carbon reduction impact of their clean electricity procurements when they otherwise could not.

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1. RE100 2023 Annual Disclosure Report. RE100, March 6, 2024.
2. This report uses the term "clean electricity" as an umbrella term for different low or carbon-free electricity generation sources, including but not limited to electricity generated from solar, wind, geothermal, hydropower, and biomass. These sources are also described as carbon-free electricity generation sources, or carbon-free energy sources.
3. Corporate Clean Power Buying Grew 12% to New Record in 2023, According to BloombergNEF. BloombergNEF, February 13, 2024.
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6. References to many such studies are included in Evidence Synthesis Report Part 2: Environmental Attribute Certificates, Version 1.0. Science-Based Targets Initiative, March 2025.
7. "Future research should explore such potential behavioral impacts of emission accounting rules". Bjorn, Lund, and Brander, Up to half of companies would be behind on their climate targets under stricter scope 2 accounting rules. Environmental Research Letters, January 10, 2025.
8. All revision proposals submitted during this public input period are available on the GHG Protocol website.
9. For definitions and information on market boundaries, time/temporal matching, and additionality, please review the GHG Protocol Scope 2 Guidance (2015).
10. The survey provided this definition and description of additionality: "The term additionality has many possible definitions. In this survey additionality means the requirement that contracted clean energy generation be from new resources (e.g., reaches commercial operation after a certain date or after a procurement company's new load comes online), contracted through long-term procurements (e.g., PPAs with term lengths over 10 years), and/or some combination of the two. The examples in this definition are illustrative."
11. For estimates of the geographic distribution of corporate PPAs, see Corporate Clean Power Buying Grew 12% to New Record in 2023, According to BloombergNEF. BloombergNEF, February 13, 2024.
12. For information on the electric grid market structures and availability of voluntary clean electricity procurement types, see Voluntary Renewable Energy Procurement Options Available in Select Countries. Anthesis, June 2024.

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