

# SUMMARY OF PUBLIC CONSULTATION

## VT0011 Electricity System Emission Factors, v1.0

A draft of *VT0011 Electricity System Emission Factors, v1.0*, was open for public consultation between October 3, 2024 and November 4, 2024. This document includes a list of all comments received and the developer's response.

## KEY QUESTIONS

Q1: Do you agree that the proposed changes will improve the accuracy and conservativeness of the estimation of reductions and removals?

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#	Organization	Comment	Developer's Response
1	Anonymous	Conservativeness obviously, accuracy yes in theory, however in practise several obstacles are likely to prevent the annual ex-post revision of calculations (availability and timely access to data)!	Thank you very much for the comments. We understand the concerns regarding the data availability. We will study other alternatives to be implemented in future revisions.

Q2: Do you think the project proponents will be able to re-calculate the OM and BM emission factors at the required frequency to comply with the proposed changes and the CCP requirements?

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#	Organization	Comment	Developer's Response
2	Anonymous	No! We are involved in many grid-connected project instances in Africa where despite several attempts/requests and reminders to the relevant grid authorities, no recent production and consumption data can be retrieved and the annual reports which were from time to time publicly released are no longer made public.. Given the challenges and lengthy efforts often at stake for retrieving such data, ex-post annual update shouldn't be mandatory in order not to discriminate countries where such data is hard to access, and alternatives should be kept available.	Thank you very much for the comments. We understand the concerns regarding the data availability. We will study other alternatives to be implemented in future revisions.

Q3: Do you think that the increased weighting of the BM should be applied to both ex-ante and ex-post options? or only relevant if ex-ante?

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#	Organization	Comment	Developer's Response
3	Anonymous	The increased weighing should only apply ex-ante.	Thank you very much for your comments. We will study the possibility of applying the change in the weighing only for the ex-ante option in future revisions of the Tool.

Q4: Do you think that an ex-ante option should still be allowed for projects supplying electricity to the grid, or reducing electricity consumption from the grid? If so, how could accuracy and conservativeness be ensured given the changes of the emissions factor during the crediting period?

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#	Organization	Comment	Developer's Response
4	Anonymous	Yes, absolutely! Accuracy / conservativeness could still be supported by benchmarking alternative sources of grid emission factors calculations such as the Harmonized IFI Default Grid Factors (based on International Energy Agency database) or by considering the latest additions/trend since previous calculation to either confirm validity or allow downward adjustment.	Thank you very much for your comments. We will study different alternatives to the yearly determination in future revisions of the Tool.

Q5: Could an ex-ante option with a downward adjustment factor be helpful to balance robustness, conservativeness and simplicity? How could this factor be determined?

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#	Organization	Comment	Developer's Response
5	Anonymous	Precisely, maybe depending on a prorata of latest renewable energy capacity additions (month/year) out of total known capacity, fossil fuel price index, similar/regional trend etc. ?	Thank you very much for your comments. We will study different alternatives to the yearly determination in future revisions of the Tool.

# GENERAL FEEDBACK

## Section 5 - Procedures

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#	Organization	Comment	Developer's Response
6	Eco-Ideal Consulting	<p>According to TOOL TO CALCULATE EMISSIONS FROM ELECTRICITY CONSUMPTION, under scenario A: grid electricity consumption, Section 5.3.1 (1)(a) specifies projects that increase electricity consumption from the baseline to the project scenario (including leakage) to use the combined margin EF of the grid.</p> <p>According to M0325 ELECTRICITY SYSTEM EMISSION FACTOR Step 6: Calculate the combined margin emissions factor, the paragraph 86, Case 2 specifies project increasing the consumption of electricity from the grid: for all crediting periods: wOM =1.0 and wBM =0.0</p> <p>Given this, should all projects that increase electricity consumption from the grid apply the operating margin EF exclusively? If so, it would be clearer to directly specify the adoption of the operating margin EF instead of referencing the combined margin EF with a zero weight for the build margin, in two separate documents.</p>	<p>Thank you very much for your comments. The VCS Tool VT0010: Tool to Calculate Emissions from Electricity Consumption and Generation, was revised after the public comments. The final version approved on 27 November 2024, available at the VERRA website (link: <a href="https://verra.org/methodologies/vt0010-emissions-from-electricity-consumption-and-generation-v1-0/">https://verra.org/methodologies/vt0010-emissions-from-electricity-consumption-and-generation-v1-0/</a>), refers to the VCS Tool VT0011 to calculate the grid EF. Further indications regarding when the Combined Margin and Operating Margin can be applied are now only included in the VT0011 paragraph 86.</p>
7	Eco-Ideal Consulting	<p>According to TOOL TO CALCULATE EMISSIONS FROM ELECTRICITY CONSUMPTION, under scenario A: grid</p>	<p>Thank you very much for your comments. The VCS Tool VT0010: Tool to Calculate Emissions from Electricity Consumption and Generation, was revised after the</p>

## Section 5 - Procedures

#	Organization	Comment	Developer's Response
		<p>electricity consumption, Section 5.3.1 (1)(b) specifies projects that decrease electricity consumption from the baseline to the project scenario (including leakage) to use the operating margin EF of the grid.</p> <p>According to M0325 ELECTRICITY SYSTEM EMISSION FACTOR Step 6: Calculate the combined margin emissions factor, the paragraph 86, Case 1 specifies projects that result in electricity savings from the grid to use different wOM and wBM.</p> <p>Given this, are “decreasing consumption” and “electricity savings” the same concept? If so, how can emission reductions be calculated? Are emissions solely determined based on the Combined Margin (CM) or Operating Margin (OM), or baseline emissions calculated using CM and project emissions using OM?</p>	<p>public comments. The final version approved on 27 November 2024, available at the VERRA website (link: <a href="https://verra.org/methodologies/vt0010-emissions-from-electricity-consumption-and-generation-v1-0/">https://verra.org/methodologies/vt0010-emissions-from-electricity-consumption-and-generation-v1-0/</a>), refers to the VCS Tool VT0011 to calculate the grid EF. Further indications regarding when the Combined Margin and Operating Margin can be applied are now only included in the VT0011 paragraph 86.</p>

## General Comments

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#	Organization	Comment	Developer's Response
8	Eco-Ideal Consulting	As most national reporting is based on the Operating Margin (OM) grid emission factor, it is sensible that there could be a	Thank you very much for your comments. We acknowledge that when different calculation procedures are applied in the calculation of the mitigation actions

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		<p>mismatch when reporting their NDC achievements as emission reductions are calculated using the Combined Margin (CM). Would it be possible to consider accepting the OM instead, so that the corresponding adjustment can be performed on a 1:1 basis? If not, could Verra suggest an alternative solution to address this misalignment?</p>	<p>associated with NDCs and the calculation of VCUs, there may be a mismatch in the use of Corresponding Adjustments. However, there are no clear rules on how to calculate the outcomes of mitigation actions to achieve NDCs, as there are in the VCS. Thus, until clear rules are established on the calculation of mitigation outcomes, we encourage PPs to apply the procedures for VCUs calculation to align the outcomes.</p>