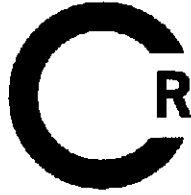


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**The Climate Registry**

September 8, 2008

Public Utility Commission of Ohio  
Case No. 08-888-EL-ORD  
4901:1-41 Greenhouse Gas Reporting and Carbon Dioxide Control Planning

The Climate Registry offers the following comments on the proposed Greenhouse Gas Reporting rule.

The Climate Registry's mission is to set consistent and transparent standards for the measurement, verification, and public reporting of greenhouse gas emissions throughout North America, and to collect emissions data in a single unified registry. The Registry is a non-profit organization that supports both voluntary and mandatory reporting programs, provides meaningful information to reduce greenhouse gas emissions, and embodies the highest levels of environmental integrity. The Registry is governed by a board of directors composed of member U.S. and Mexican states and Canadian provinces. Ohio is a founding member of The Climate Registry and Chris Korleski, the Director of the Ohio Environmental Protection Agency, is an active member on our board and the protocols and programs committee.

The Climate Registry has over 270 reporters representing a wide range of sectors that participate in its voluntary reporting program. Reporters agree to annually submit greenhouse gas data from their direct and indirect emissions, have this information third-party verified and then make their greenhouse gas emissions report publicly available.

We believe the greenhouse gas rule interprets the legislation with great precision; however, we recommend added clarity to better define which organization should receive utilities' reported greenhouse gas data so the rule does not overextend the breadth of The Climate Registry's requirements. We strongly suggest that the proposed Ohio greenhouse gas reporting rule section 4901:1-41-02(A) should be amended to read:

Any person which owns or operates an electric generating facility within Ohio shall, report at least scope 1 direct greenhouse gas emissions to the state of Ohio according to the protocols approved by the climate registry, or as otherwise directed by the commission.

**Deleted:** become a participating member in the climate registry for at least scope 1 (direct) greenhouse gas emissions, and shall

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According to the protocols of The Climate Registry's voluntary reporting program, an electric generating facility must report their North American direct and indirect greenhouse gas emissions to The Climate Registry for all their operations. The Climate Registry supports state mandatory programs that require only direct emissions (scope 1) if the greenhouse gas emissions are reported to the state. Therefore, we recommend the language changes above with the specific addition of "to the state of Ohio" to make this distinction clear. Generators are welcome to join the Climate Registry and voluntarily report their North American emissions; however, the Ohio rule cannot require them to do so.

If you have questions about the Climate Registry, please contact Ann McCabe, Midwest Regional Director, 1543 W. School St., Chicago, IL 60657 at 773-661-1230 or [ann@theclimateregistry.org](mailto:ann@theclimateregistry.org). More information about the Registry can be found at: [www.theclimateregistry.org](http://www.theclimateregistry.org).

Thank you for the opportunity to comment on this rule.

A handwritten signature in black ink, appearing to read "Ann McCabe", with a long horizontal flourish extending to the right.