

Thank you for the opportunity to comment on the draft of version 2.0 of the Livestock Project Reporting Protocol. TerraPass support the development of robust project protocols suitable for the voluntary and pre-compliance marketplace. We commend your thorough benchmarking of other protocols already in place, and your transparent process in the development of these documents so they may be acceptable to other protocols.

TerraPass is hopeful that our experience with working with livestock digester projects under a variety of voluntary carbon market standards is helpful for the development of a robust and environmentally credible reporting protocol that can be used at domestic projects.

Comments:

Comment 1- Page 20; Equation 4a

Our first observation is that for determining BCE, most digester project developers do not report a rated capture efficiency of their digesters. This is due in large part to an overall lack of system level control of these projects, and the fact that designs vary widely and are customized to site specific factors such as scale, energy outputs, use of heating and budget. A default factor, such as ACM0010's 15%, seems appropriate allowing project developers to justify a lower BCE if they so choose, with a clear and easy way for project proponents to justify their BCE.

Comment 2 – Page 11; Equation 1

In keeping with the practice of benchmarking to established methodologies we believe that the draft protocol may omit an important mechanism for ground-truthing modeled data at digester projects. In ACM0010 and the CCX protocol the calculated baseline emissions of methane are compared to the actual metered quantity of biogas sent to combustion devices and the lesser of those two quantities is used, thereby crediting only actual methane destruction.

Within our experience there is often a significant difference between the modeled baseline emissions and the actual metered methane destruction of projects due to start up periods, venting events and other operational issues which would result in substantially less methane destruction that a calculated baseline would predict.

Relying solely on modeled methane emissions to calculate total emissions reductions may undermine market perception of the environmental credibility of CCAR offsets, particularly given that consumers have access to offsets generated with a metered methane destruction through CCX or ACM0010.

Thank you again for the opportunity to comment on the protocol. If you have any questions, please feel free to contact me.

Sincerely,

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About TerraPass

TerraPass is a leading carbon offset retailer, with a strong focus on serving consumers. Over 150,000 individual TerraPasses have been sold to offset emissions from driving, flying, and home energy use. We believe that we and other industry participants can build a market of millions of consumers who use high-quality offsets to complement their own energy conservation efforts.