

Power Sector Net-Zero Standard Public Consultation

VALMIS

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Q1

First name

Lasse

Q2

Last name

Leipola

Q3

Job title

climate policy specialist

Q4

Email

lasse.leipola@finnwatch.org

Q5

Confirm email

lasse.leipola@finnwatch.org

Q6

Organization name

Finnwatch

Q7

In what sector does your organization operate?

Other (please specify):
civil society

Q8

Type of organization

Civil Society & Advocacy NGO

Q9

What country is your organization headquartered in? If you are responding in a personal capacity, please select the country where you are based.

Finland

Q10

In which regions does your organization have significant operations or value chain activities?

Europe

Q11

Are you responding to this survey based on your experience and understanding of:

Your experience with a range of organizations

Q12

Results of this consultation will be made publicly available but may be anonymized to the stakeholder group level, for example "ABC Corporation" becomes "Company". Would you like your responses to be made anonymous?

No

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Q13

Are you a current or previous SBTi advisory or working group member?

No

Q14

If so, which group? (select as many as are relevant)

Respondent skipped this question

Q15

To what extent do you agree or disagree with the following statements?

The Power Sector Net-Zero Standard is easy to understand Neutral

The Power Sector Standard is ambitious enough to meaningfully take science-based climate action Somewhat agree

The Power Sector Standard is actionable Somewhat agree

The Power Sector Standard will assure the credibility of companies' climate action Somewhat agree

The Power Sector Standard strives for equity and does not compromise environmental sustainability Neutral

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Q16

Do you think the scope of the Power Sector standard is clearly defined?

Respondent skipped this question

Q17

Do you think the list of activities and emissions in scope is comprehensive and appropriate?

Respondent skipped this question

Q18

Do you think the applicability criteria and thresholds of the standard are adequate?

No (please specify):
It should be specified that the 10 000 t threshold applies also to biogenic emissions. Without such specification large scale power generation from biomass may be excluded.

Q19

Do you think the absolute emission threshold (10.000 tCO2e) is too low? If yes, please explain why and suggest alternative thresholds. Feel free to include examples of companies types/structures that you believe should or should not be in scope based on these criteria.

Respondent skipped this question

Q20

Do you have any comments on the representation of activities and emissions in scope in A.5.1 and Annex C of the Standard?

Biogenic emissions should be included.

Q21

Do you think the way the draft Corporate Net-Zero Standard V2 criteria applicability is explained in each chapter is clear enough to enable an efficient applicability of both Standards in parallel? If not, do you have any suggestions to improve on this aspect?

Respondent skipped this question

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Q26

Do you agree with providing different options for setting targets in the interim years other than emission intensity reduction?

Yes

Q27

Do you think an asset plan as defined in criterion PS-C4 could also be used as an alternative to the near-term target options defined in sub-criteria 3.2.1 and 3.2.2?

No (please specify):

Not as an alternative, but as an additional requirement.

Q28

Does the maintenance method suitably address the need for 100% renewables/low carbon power companies to have achievable targets?

Respondent skipped this question

Q29

Does the SDA linear convergence adjustment suitably address the need for highly (but not fully) decarbonized power generation companies to have achievable targets, while maintaining the fundamental principles of the SDA?

Respondent skipped this question

Q30

Are the physical intensity values in the low intensity threshold too low to serve the intended purpose, i.e., would power generation companies with physical intensity above the threshold still struggle to achieve near-term SDA targets?

Respondent skipped this question

Q31

Is the level of accuracy required to calculate the intensity values in the threshold realistic for most power generation companies? If not, what is a reasonable level of accuracy that most companies are able to achieve?

Respondent skipped this question

Q32

Do you think the low-carbon technology share is an appropriate alternative for emission intensity reduction targets for the interim target years?

No (please specify):

It should be noted that technology share neglects the differences between different fossil fuels, which would be included in the intensity figures. This is acceptable if PS-C4 on phaseout deadlines will become a mandatory requirement.

Q33

Do you agree with proposed differentiation in technology share between low carbon and unabated fossil fuel power generation?

Respondent skipped this question

Q34

Would you prefer additional granularity in the technology share metrics to further distinguish between power generation technologies?

Respondent skipped this question

Q35

Do you think the low carbon generation target should follow a different method and trajectory (e.g., linear)?

Respondent skipped this question

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Q36

Do you agree with the inclusion of a mandatory requirement for companies to disclose an asset plan to phase out unabated fossil fuel power generation capacity?

Yes

Q37

Do you think criterion PS-C4 should be a mandatory requirement or is an appropriate alternative to the near-term target-setting approaches presented in sub-criterion C3.2? If yes, in which circumstances?

Yes (please specify):

Yes, it should be mandatory. Otherwise, it would be possible to extend coal power generation for example by adding adequate amount of low-carbon production. Such flexibility could encourage companies to take a risk on extending unabated fossil power production with an uncertain prospect of CCS.

Q38

Do you agree with the milestones proposed for OECD and non-OECD countries?

Respondent skipped this question

Q39

Do you agree with the requirement to include maximum 5-years interim milestones in the plan?

Yes

Q40

Do you think more flexibility should be provided for unabated coal capacity for security purposes or retroht planning?

No

Q41

Do you agree with the exemption of non-baseload capacity from unabated natural gas phase out requirements?

Respondent skipped this question

Q42

Do you think the requirements in sub-criterion C4.3.4 to demonstrate exemption of non-baseload capacity are appropriate? If not, what relevant supporting documentation should be provided by companies?

No (please specify):

Companies should provide an estimated annual utilization rate of these assets and should be obligated to regularly report the actual figures and justification for the use. For maximum utilization rate, there should be a fixed cap. This is needed to clarify that production that is regularly used through winter months (but is inactive for most of the year) could not be considered as non-baseload.

Q43

Do you agree with the definition of non-baseload capacity included in Annex A of this Standard? If not, should a more quantitative definition be included for the exempted capacity and what is the suggested value/approach?

No (please specify):

Reference to "peak load management" leaves too much room for interpretation as peak loads can occur on a regular basis and there will be more and more adjustable demand. For example, the installations that are regularly used to produce electricity when the price is high, should be excluded (even if they are "non-baseload"). For this reason it would be clearer to define non-baseload as something that is needed only "for "grid security and stability". We also support a more quantitative definition that excludes production that is regularly in use. This could be adequately low cap on annual operation hours.

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Q44

Do you agree with the inclusion of a criterion for biomass for power generation being 100% sustainably sourced by 2030?

Yes

Q45

Do you agree with the disclosure requirements around certification schemes and assurance?

No (please specify):

See, our response for question 47.

Q46

Do you think we should specify additional reporting requirements on forest, land and agriculture (FLAG) emissions other than those specified in the SBTi FLAG Guidance and the GHG Protocol?

Respondent skipped this question

Q47

In your opinion, what are the criteria that the SBTi should set up to endorse biomass certification schemes?

Finnwatch welcomes SBTi's proposal to develop criteria for approving biomass certification sustainability schemes. We also strongly support that this will be based on existing frameworks to avoid unnecessary administrative burden and cost.

The ISEAL Code of Good Practice for Sustainability Systems has been developed internationally to ensure the credibility and quality of certification schemes. This Code sets requirements for standard-setting, assurance and monitoring, evaluation and learning from them, and claims. SBTi should only approve biomass certification operators that comply with the ISEAL Code. Many commercial and widely used biomass certification schemes such as FSC and RSPO are already ISEAL Code Compliant. Please also note the ISEAL Alliance Guidance on Credible Benchmarking (<https://isealliance.org/what-we-do/credible-practice/good-practices-credible-benchmarking>). For certification bodies, ISO 17065 is a good reference.

However, we did not quite understand why the consultation document referenced a single certification scheme, the SBP, and its process document "Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification". SBTi's approval system cannot be based on the criteria of a single commercial scheme.

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Q54

For trade and retail activities, do you think the technology share convergence is an appropriate method?

No (please specify):

As traders/retails have more flexibility (no fixed assets, just purchase agreements) they should be able to adhere to the SDA without flexibility from convergence.

Q55

Would you prefer additional granularity in the unabated fossil fuel technology share to distinguish also between unabated coal, oil and natural gas?

Respondent skipped this question

Page 8

Q56

Do you think Annex A provides a comprehensive and clear set of the definitions for terms used in this Standard?

No (please specify):

See our response on definition of non-baseload. In addition to that, it could be helpful to have a separate definition for what is considered "baseload capacity".

Q57

Do you agree with the definition proposed for non-baseload capacity?

No (please specify):

Reference to "peak load management" leaves too much room for interpretation as peak loads can occur on a regular basis and there will be more and more adjustable demand. For example, the installations that are regularly used to produce electricity when the price is high, should be excluded (even if they are "non-baseload"). For this reason it would be clearer to define non-baseload as something that is needed only "for "grid security and stability".

Q58

Do you agree with the definition for low carbon and unabated fossil fuel power generation?

Respondent skipped this question

Q59

Do you agree with the minimum threshold for carbon capture to be included in the low-carbon technology category to be set at 95%?

Respondent skipped this question

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Q60

Do you have any other feedback on the draft Standard that wasn't addressed in this survey? Please share.

The current standard for power sector clearly requires net zero by 2040, but the draft refers only to net zero by 2050. As specific requirements in this draft would lead to de-facto net zero by 2040 for companies that do not have operations/emissions from other sectors, it should be explicitly stated that companies exclusively in power sector must set their net zero target for 2040 or before.

Q61

How accessible did you find this survey?

Somewhat accessible

Q62

How did you find out about this public consultation? (Select all that apply)

LinkedIn

SBTi newsletter

Q63

If you do not already receive the SBTi newsletter, would you like to sign up to stay informed with the latest news from the SBTi?

Respondent skipped this question

Q64

The SBTi would like to keep you updated on the development of the Power Sector Net-Zero Standard and other SBTi projects. Please let us know if you consent to SBTi contacting you this way.

Yes

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