

Carbon Disclosure Project

CDP 2012 CDP Water Disclosure 2012 Information Request

Centrica

Module: Introduction - 2012 CDP Water Disclosure

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0.1

Introduction

Please give a general description and introduction to your organization.

About Centrica

Our vision is to be the leading integrated energy company in our chosen markets. We source, generate, process, store, trade, save and supply energy and provide a range of related services. We secure and supply gas and electricity for millions of homes and business and offer a range of home energy solutions and low carbon products and services.

We have strong brands and distinctive skills which we use to achieve success in our chosen markets of the UK and North America, and for the benefit of our employees, our customers and our shareholders. In the UK, we source, generate, process and trade gas and electricity through our Centrica Energy business division. We store gas through Centrica Storage and we supply products and services to customers through our retail brand British Gas. In North America, Centrica operates under the name Direct Energy, which now accounts for about a quarter of group turnover.

We believe that climate change is one of the single biggest global challenges. Energy generation and energy use are significant contributors to man-made greenhouse gas (GHG) emissions, a driver of climate change. As an integrated energy company, we play a pivotal role in helping to tackle climate change by changing how energy is generated and how consumers use energy. Our corporate responsibility (CR) ambition is to be the most trusted energy company moving towards a low carbon future.

With regard to water related risks and opportunities, more than 99% of our water use is related to our upstream operations where it is used for cooling water in our power stations and gas assets. Using the Water Footprint Networks definition, the vast majority of water we withdraw is used rather than consumed as it is returned to the same water catchment area within the same cycle period.

For a company of our size, we consume a relatively small amount of water, although our use - especially for cooling - is significantly greater. We recognise that water availability is becoming increasingly significant to our global stakeholders and are working to increase the visibility of our water footprint. However, we do not consider water to be a material issue for Centrica. Our water use falls into three main categories:

1. Office water is potable water consumed in our buildings
2. Single pass cooling water is water that we do not consume but redirect through pipes to cool our power generation or gas processing facilities before returning it to the same water source over a short time period; we source our cooling water from seas, rivers and estuaries (more than 98% is saline)
3. Process water is consumed water that we use and which is then subject to on- or off-site treatment before being used again or returned to a water source

As clean water sources become increasingly scarce, we remain committed to using water efficiently and responsibly. In 2011, we reduced our UK office water use by 6.8% compared to 2010, slightly missing our 7.5% annual target. We aim to reduce our UK office water use by a further 5% in 2012.

0.2

Reporting Year

Please state the start and end date of the year for which you are reporting data.

Enter the period that will be disclosed.

Sat 01 Jan 2011 - Sat 31 Dec 2011

0.3

Reporting Boundary

Please indicate the category that describes the reporting boundary for companies, entities, or groups for which water-related impacts are reported.

Other: Companies, entities or groups in which we have equity share and we have operational control

**0.4
Exclusions**

Are there any geographies, facilities or types of water inputs/outputs within this boundary which are not included in your disclosure?

No

Module: 2012-Water-Management

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**1.1
Does your company have a water policy, strategy or management plan?**

Yes

**1.1a
Please describe your policy, strategy or plan, including the highest level of responsibility for it within your company and its geographical reach.**

Country or geographical reach	Description of policy, strategy or plan	Position of responsible person
Global	At a Group level, our policy on water use is enshrined within our Group Environment Policy which includes a key commitment to the efficient use of resources such as water. The policy is underpinned by our Group Standard on Health, Safety and Environment against which each business unit is audited to confirm that adequate controls and objectives or targets are in place to ensure the efficient use of water. Owing to the spatiotemporal variability of water use impacts and the diversity of our business activities, we believe that water management plans are best implemented at an individual site level. In particular, our power stations and gas assets have all gone through the process of planning and / or licensing applications involving the completion of environmental impact assessments in liaison with the appropriate regulators and authorities and encompassing water impacts in terms of use, consumption and discharge. Within this disclosure, we employ the following definitions: Use - where we withdraw and return water to the same catchment area and within the same water cycle period (eg cooling water) Consumption - where we withdraw and use water but do not return it, or return it within a different cycle period or to a different location (such as a sewer or treatment plant) Discharge - where water is returned to a water source or sent for off-site treatment Following environmental impact assessments, individual sites will have water management plans produced as necessary and in agreement with the relevant authority. These water management plans can vary in content and format ranging from stand-alone controls such as drought contingency plans to limits and thresholds relating to the volume or rate of water withdrawal or quantity and quality of water discharge prescribed within our operating licence. In a small number of cases, our water use and consumption is not considered sufficiently material to have such a water management plan. Our water resources management at each site is reviewed regularly through our Environmental Management Systems.	Other: The Chief Executive has responsibility for the Group Environment Policy. Site water management plans are the responsibility of individual Site Managers/Plant Directors

**1.1b
Does the water policy, strategy or plan specify water-related targets or goals?**

Yes

1.1c

Please describe these water-related targets or goals and the progress your company has made against them.

Country or geographical reach	Category of target or goal type	Description of target or goal	Progress against target or goal
Global	Direct operations	Compliance with our prescribed limits on a site level basis	Where we have limits on the quality of discharge and quantity of abstraction then our target is to comply with those. This varies from site to site. In 2011 we had no incidents resulting in legal action; however there were a number of reportable incidents that were water related.
United Kingdom	Community engagement	Reduce office water use by 7.5% in 2011 compared to 2010	In 2011, we reduced our comparable UK office water use by 6.8%, compared to our target of 7.5%. In 2012 we aim to reduce our UK office water use by a further 5%.

1.2

Do you wish to report any actions outside your water policy, strategy or management plan that your company has taken to manage water resources or engage stakeholders in water-related issues?

Country or geographical reach	Category of action	Description of action and outcome
United Kingdom	Community engagement	Some of our upstream sites that have assets on the edge of water catchments support catchment maintenance activities Two upstream assets with production terminals on the coast undertake regular beach cleans in association with the local communities. These assist in the protection of the local aquatic habitats
United Kingdom	Supply chain and watershed management	We are developing a method for assessing and managing risks in our supply chain, including identifying and managing water risks associated with our suppliers. We have identified and trialled a suitable software and consultancy service to assess suppliers risk.
United Kingdom	Direct operations	We have undertaken an assessment of the impacts of climate change on our power generation assets, including the associated risks of flooding and drought We published the Climate Change Adaptation Report in July 2011
Global	Direct operations	We aim to measure all our water withdrawals through direct measurement. Where this is not possible, we employ calculations based on pump rates and operating profiles. We measure the quality and volume of water discharges primarily at our upstream assets where we've used fresh water. We do not measure open sea discharges or discharges from our offices, but are able to measure these based on withdrawal data and type of use/consumption.
Global	Direct operations	We have made changes to technologies used in offices and at selected upstream assets to reduce year-on-year consumption. In addition, our UK upstream assets undertake water efficiency audits which lead to recommendations for technology and process change. In 2011 our overall water consumption decreased by 5.9% compared to 2010. Due to four of our UK power stations having been placed into preservation for some of 2011, our power station cooling water use is also much reduced.
Global	Direct operations	We routinely self-impose limits and checks on water costs at each site as part of the normal budgeting processes of running a plant or office. These costs are therefore regularly reviewed and if they exceed the limits then processes are in place to trigger investigation and/or change. However, currently the costs of water are considered relatively immaterial to our operations. No investigations were triggered in 2011; however ongoing reviews still take place to identify opportunities for reductions in water consumption and associated consumption costs.
Global	Transparency	We publicly report our water footprint under the categories of office water, cooling water and process water through our corporate responsibility report, providing chartable data. The

2011 report is available at www.centrica.com/responsibility. See attached PDF taken from our web site

Attachments

[https://www.cdproject.net/Sites/2012/42/3042/CDP Water Disclosure 2012/Shared Documents/Attachments/CDPWaterDisclosure2012/1.WaterManagementandGovernance/1.2 water and waste.pdf](https://www.cdproject.net/Sites/2012/42/3042/CDP%20Water%20Disclosure%202012/Shared%20Documents/Attachments/CDPWaterDisclosure2012/1.WaterManagementandGovernance/1.2%20water%20and%20waste.pdf)

Module: 2012-Water-RisksOps

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2.1

Are any of your operations located in water-stressed regions?

Yes

2.1a

Please specify the method(s) you use to characterize water-stressed regions (you may choose more than one method).

Method used to define water stress	Please add any comments here:
Environmental assessment Internal company knowledge WBCSD Water Tool	We have used the WBCSD Water Tool to map our locations against the mean annual relative water stress index. We have seven locations in North America where water is deemed 'scarce' under this Index. We have a further 14 locations in areas where water is deemed 'stressed' and 18 categorised as 'medium' using the definitions and information provided by the WBCSD Global Water Tool.

2.1b

Please list the water-stressed regions where you have operations and the proportion of your total operations in that area.

Country or geographical reach	Region within country	Proportion of operations located in this region (%)	Further comments
United States of America	Texas	1 – 10	There are four offices/warehouses in Texas where water is deemed 'scarce' and one power station. Four of these are in the Trinity Basin area. There are two office locations in Texas where water is deemed 'stressed' and five that are medium.
United States of America	North Carolina	1 – 10	There is one warehouse in North Carolina where water is deemed 'stressed'.
United States of America	California	1 – 10	One office in California is in a 'scarce' region
United States of America	Nevada	1 – 10	One warehouse in Nevada is in a scarce region
United States of America	Ohio	1 – 10	One Warehouse in Ohio is in the St Lawrence basin, a water stressed region. Three others in the St Lawrence basin are 'medium'.
United States of America	New York	1 – 10	One warehouse in New York is in a water 'stressed' region
United States of America	Mississippi Region	1 – 10	Seven sites in the Mississippi region are 'medium'
Canada	Ontario	1 – 10	There are nine offices/warehouses in the St Lawrence Basin of Ontario where the water is deemed 'stressed' and two in the same catchment that are 'medium'

Netherlands

Hoofddorp

One office in the Netherlands is 'medium'

2.2

Are there other indicators (besides water stress) which you wish to report that help you to identify which of your operations are located in regions subject to water-related risk?

Yes

2.2a

Please list the regions at risk where you have operations, the relevant risk indicator and proportion of your total operations in that area.

Country or geographical reach	Region within country	Risk Indicator	Proportion of operations located in this region (%)	Further comments
United Kingdom	Humber	Other: Future drought risk	1-10	One Power station has been identified as having medium risk to freshwater availability in the future, as a result of droughts caused by climate change

2.3

Please specify the total proportion of your operations that are located in the regions at risk which you identified in questions 2.1 and/or 2.2.

25%

2.4

Please specify the basis you use to calculate the proportions used for questions 2.1 and/or 2.2.

Basis used to determine proportions	Please add any comments here
Number of facilities	This is calculated on the number of sites that are categorised as having some form of risk (ie a risk rating greater than 'low') as a percentage of the number of land based sites we occupy. These include offices, warehouses and industrial sites. None of these cases are considered a significant risk in our internal risk management processes.

Further Information

Note: only regions identified as having a greater risk than 'low' have been noted in sections 2.1 and 2.2

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2.5

Do any of your key inputs or raw materials (excluding water) come from regions subject to water-related risk?

Don't know

2.5b

You may explain here why you are not able to identify if any of your key inputs or raw materials come from regions subject to water-related risk and whether you have plans to explore this issue in the future.

We believe that we do not have key water-intensive inputs from water-stressed regions. However we do not currently have enough information to be certain.

We request information from key suppliers on their risks and management of environmental matters which will implicitly include water.

We have been trialling a supply chain risk management tool that requests our suppliers provide information about business sustainability issues, The environmental component of the questionnaires, have specific questions relating to water management and risk

The enhanced information acquired through this process should enable us to identify more accurately whether we have water-intensive inputs from water-stressed regions and to work closely with our suppliers in these cases to reduce water-related impacts where practicable.

Page: 2012-water-3-riskassess-op

3.1

Is your company exposed to water-related risks (current or future) that have the potential to generate a substantive change in your business operation, revenue or expenditure?

No

3.1b

Please explain why you do not consider your company to be exposed to any water-related risks that have the potential to generate a substantive change in your business operation, revenue or expenditure.

Physical risks related to water are not currently identified as significant through our internal risk management processes.

Physical water risks associated with our UK power generation have been recently assessed through our climate change adaptation programme. While flooding and water availability were identified as potential risks. They were all rated as currently low or very low risk.

The cost of water to our business is immaterial relative to other commodity costs, such as gas prices. We do not foresee any tightening of regulations in areas where we operate in terms of access to water or limits to our use of it. Of all our operations, it is in Texas where water use is most heavily regulated but we are not anticipating significant shifts in regulation there.

Worldwide, our key regulatory risks are related to carbon and climate change legislation rather than water. We operate high hazard facilities where there are inherent risks which could impact on water. However, we have strong operational systems and process controls in place to manage and mitigate these risks. The consequences of an incident could include litigation and reputation risk but this is more likely to be related to wider issues than water. Therefore risks in this area specifically related to water are not currently considered to be significant.

3.2

What methodology and what geographical scale (e.g. country, region, watershed, business unit, facility) do you use to analyze water-related risk across your operations?

Risk methodology	Country or geographical scale
1. Environmental impact assessment (facility level) 2. Power station adaptation at business level (National - UK) 3. Invoice validation process (facility level) - As part of our energy/water management services we monitor water consumption (including using the Group's remote monitoring system to gather real-time consumption data for the larger sites). Any exceptional usage, or upward trend above the site specific consumption targets, is noted and investigated; all water/sewerage invoices are checked against recorded consumption data/meter readings for accuracy and any billing irregularities are investigated and resolved with the supplier where applicable.	Facility

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3.3

Do you require your key suppliers to report on their water use, risks and management?

No

3.4

Is your supply chain exposed to water-related risks (current or future) that have the potential to generate a substantive change in your business operation, revenue or expenditure?

Don't know

3.4c

Please explain why you do not know if your supply chain is exposed to any water-related risks that have the

potential to generate a substantive change in your business operation, revenue or expenditure, and if you have plans to assess this risk in the future.

We have processes in place to assess key risks and to date they have shown us nothing significant that is water-related. However, we currently do not have enough data to know with certainty. Companies and organisations are not yet reporting comprehensively on water risks and issues and therefore it is difficult to assess the impact of other water-related risks on our supply chain.

Our recent pilot of a supply chain risk assessment tool (as described in section 2.5b) indicates that use of the tool and through programmes such as the CDP Water Disclosure Project, we expect to be able to understand potential risks further in future. However, we are too early in the process to be confident in our knowledge of our supply chain water risk.

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4.1

Has your business experienced any detrimental impacts related to water in the past five years?

Yes

4.1a

Please describe these detrimental impacts including (i) their financial impacts and (ii) whether they have resulted in any changes to company practices.

We have not had any significant detrimental impacts related to water over the last five years. However, as reported through the Carbon Disclosure Project, we do monitor flood risk to our assets. In the UK, flooding in 2008 disrupted output at our Brigg and Killingholme power stations for a short duration. Coastal flooding is also a risk for all the nuclear stations which we jointly own with EDF and for our processing facilities at Morecambe and Easington. Our Humber and Roosecote power stations are also on the coast and we have onshore substations for our offshore wind farms. Weather-related risks such as flooding can have a significant financial impact. The actual figure would depend on which facility was affected and the condition of the market at the time the power station was switched off. The cost impact would also depend on whether other power stations in the area were affected and on what the subsequent effects on the market would be. Conversely, if it was one of our smaller power stations the impact could be minimal depending on the time of year. However, a prolonged shutdown as a result of a weather-related event would be a significant financial cost to the business. It also means that we can meet less customer demand from our own resources and must purchase on the market. If weather-related damage is widespread, energy supply may be short and prices high. For all our 'at risk' facilities, flood risk was an important consideration in the design of the stations and construction of the sea defences. It also continues to be a risk that is actively managed. For example we have used the Environment Agency's emergency planning exercise and flood maps to identify those of our assets at a higher risk of potential flooding in extreme circumstances. We currently monitor and manage the risk of severe weather events to our facilities through our meteorology teams, crisis management and business continuity arrangements, although if weather risk increases, we will look for other ways to mitigate this through changes to operational standards.

In the UK, we are working closely with DECC on sector resilience plans to mitigate and manage the impact of physical risks as a result of climate change.

We have also been working collaboratively with the Association of Electricity Producers (AEP) to provide a sector response to our direction to report on adaptation by DEFRA. This process has involved commissioning joint studies to identify the impact of physical risks on the electricity industry. The report was completed in July 2011. The conclusions of the report are that climate change may marginally increase the risk of flooding, blocking of access routes to sites and increased water shortages during summer periods. However all the risks are considered low, except for a medium risk of drought impacting process water availability at one of our smaller power stations.

We are not able to report on financial implications because of the substantial uncertainties around the likelihood and magnitude of the risks identified. There are other industries also required to report which is helping to give adaptation issues a higher profile. We have been working to identify key stakeholder interrelationships to help us understand our wider risks.

Page: 2012-Water-5-Opportunities

5.1

Do water-related issues present opportunities (current or future) that have the potential to generate a substantive change in your business operation, revenue or expenditure?

No

5.1b

Please explain why you do not consider water-related issues to present opportunities to your company that have the potential to generate a substantive change in your business operation, revenue or expenditure or supply chain.

Water is not considered to be material to our business. The cost of water is not material enough to present significant opportunities in terms of saving. Also our water impacts are not significant enough to identify significant commercial or other opportunities. What we have done has been at a local site level, for example with our approach to biodiversity and habitat protection which has provided small-scale local engagement opportunities, although these would not be considered 'significant'. Our focus as an energy company is instead on carbon - managing the risks and taking advantage of the opportunities that carbon presents.

From our customer's perspective we have recently instigated a water related opportunity, Over the next five years, British Gas has partnered with Thames Water to promote energy saving and water saving products, including solar panels, energy efficient boilers, shower savers and dual-flush toilets. British Gas installers, while installing insulation in Thames Water customer's homes, will offer to fit water-saving devices to help people save even more money and use less water. We will also be able to check whether Thames Water customers could save money by switching energy supply to British Gas. This commercial opportunity is not expected to generate a substantive change in our business operation.

[Page: 2012-Water-6-tradeoffs](#)

6.1

Has your company identified any linkages or trade-offs between water and carbon emissions in its operations or supply chain?

Yes

6.1a

Please describe the linkages or trade-offs and the related management policy or action.

Linkage or trade-off	Policy or action
On an ongoing basis, we run energy optimisation programmes at our power plants that can lead to the installation of more efficient pumping systems, reducing water consumed as well as energy load. However, in terms of large-scale material linkages, our focus is on carbon risks and opportunities and we do not relate them directly to water.	Our group environmental policy has a commitment towards using our resources efficiently. Site specific environmental management systems and regulatory permits ensure an ongoing commitment at our operational facilities to continuous improvement and best available techniques

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7.1

Are you able to provide data, whether measured or estimated, on water withdrawals within your operations?

Yes

7.1a

Please report the water withdrawals within your operations for the reporting year.

Country or geographical reach	Withdrawal type	Quantity (megaliters/year)	Proportion of data that has been verified (%)	Comments
United Kingdom	Surface	3875	0	Includes surface water that is not single pass cooling water

United Kingdom	Groundwater	0	0	Zero groundwater abstraction
United Kingdom	Wastewater	484	0	Recovered industrial water
United Kingdom	Municipal water	672	0	
United Kingdom	Other: single pass saline cooling water	669967	0	All saline surface water
Other: North America	Surface	5487	0	Includes surface water that is not single pass cooling water
Other: North America	Groundwater	391	0	
Other: North America	Wastewater	0	0	
Other: North America	Municipal water	774	0	
Rest of world	Surface		0	
Rest of world	Groundwater		0	
Rest of world	Wastewater		0	
Rest of world	Municipal water	1	0	
Rest of world	Other: single pass saline cooling water	188	0	
Global	Other: Global total	681839	0	

7.2

Are you able to provide data, whether measured or estimated, on water recycling/reuse within your operations?

No

7.2b

Please explain why you are not able to provide data for water recycling/reuse within your operations.

We do not capture data on water recycled and reused in our operations as the volumes involved are immaterial at present. At some of our power stations cooling and boiler water is re-circulated within closed loop systems with only top up water added when needed. We also use waste water from other companies in some instances, reclaiming sewer water. However, both these forms of re-use are inconsistent with the GRI definitions for recycling.

7.3

Please use this space to describe the methodologies used for questions 7.1 and 7.2 or to report withdrawals or recycling/reuse in a different format to that set out above.

Over 99% of the water Centrica withdraws is used for cooling at our upstream power and gas assets. 98.3% of the water withdrawn is saline water and returned to the same catchment area within a short space of time and is therefore not consumed, but used. To be clear of this distinction is key to the interpretation of our data and is fundamental to the understanding of our risks and impacts related to water. This water is calculated via meter where available, or alternatively it is calculated by multiplying flow rate with pump hours. The other water sources are typically based on water meters and water bills, though in some particular instances, such as serviced offices, the volume has to be estimated based on FTE's or floor space. This is the case for our North America offices.

7.4

Are any water sources significantly affected by your company's withdrawal of water?

No

7.4b

You may explain here why your company's withdrawal of water does not significantly affect any water sources.

Over 98% of the water Centrica withdraws is single pass cooling water which is returned to the same saline catchment area (sea water) within a short space of time and is therefore not consumed, but used. This water is withdrawn from open seas or estuaries where neither the volumes nor any minor change in the water will affect the water source. Surface water abstraction is controlled by regulators to ensure that the extraction is not going to significantly affect the water source and our efforts are focused on complying with the permit limits set by the regulator. The municipal and recycled wastewater is drawn from 3rd parties who would similarly be regulated in their abstraction quantities.

Page: 2012-Water-8-Discharges

8.1

Are you able to identify discharges of water from your operations by destination, by treatment method and by quality using standard effluent parameters?

Yes

8.2

Did your company pay any penalties or fines for significant breaches of discharge agreements or regulations in the reporting period?

No

8.3

Are any water bodies and related habitats significantly affected by discharges of water or runoff from your operations?

Yes

8.3a

Please list any water bodies and associated habitats which are significantly affected by discharge of water or runoff from your operations.

Country or geographical reach	Water body	Impact	Company action and outcomes
United Kingdom	Cavendish Dock	The use of Cavendish Dock as a reservoir for the adjacent gas-fired power station has raised the water temperature within the Dock and created an environment of unique ecological interest. The dock is currently used for feeding throughout the year by wildfowl and mute swans. While significant this is a positive impact to the receiving water.	The management of the power station continues to work with key stakeholders, including Cumbria County Council, to implement a strategy for the management of the ecology of the dock. As a result there are plans to create a warm water nature reserve around the dock and its margins to provide a national nature reserve.

Further Information

With the exception of Cavendish Dock (refer above) the single pass cooling water that makes up 98% of our water withdrawals is discharged back into the same catchment in the same time period with minimal changes in characteristics. In addition, the volume of water is negligible in comparison to the water body (the sea)

The discharge of water to municipal systems is regulated by the municipal body, who in turn are regulated as to what they can discharge to the receiving environment to minimise impact.

Any discharges from our facilities into inland receiving environments is carefully regulated to minimise impacts and we are careful to ensure compliance with the associated discharge conditions

Hence, in summary there is careful control and management of discharges to receiving environments which minimises the risk of significant affects on the water bodies and their

associated habitats.

Page: 2012-Water-9-Intensity

9.1

Please provide any available financial intensity values for your company's water use across its operations.

Country or geographical region	Financial metric	Water use type (megaliters)	Currency	Financial intensity (Currency/megaliter)	Please provide any contextual details that you consider relevant to understand the units or figures you have provided.
Other: Europe	Profit	Withdrawals	GBP(£)	2808.0000	£GBP per megalitre of water withdrawn. This reflects the high volumes of cooling water used (but not consumed) in our European operations
Other: North America	Profit	Withdrawals	GBP(£)	46900.0000	£GBP per megalitre of water withdrawn. In North America single pass cooling water is not used and therefore the financial intensity is much higher

9.2

Please provide any available water intensity values for your company's products across its operations.

Country or geographical region	Product	Product unit	Water unit	Water intensity (Water unit/product unit)	Water use type	Please provide any contextual details that you consider relevant to understand the units or figures you have provided.
United Kingdom	Power	Other: GWh	Other: m3	85	Other: Consumed	m3 of water consumed per GWh of power generated. This relates to all water consumed for our gas power stations. Wind farms have almost zero water consumption so have been excluded
Other: North America	Power	Other: GWh	Other: m3	1236	Other: Consumed	m3 of water consumed per GWh of power generated. North America consumes higher volumes of water as none of the power stations have single pass cooling systems

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