



## Reporting Year 2011 Annual Verification Submission Timeline and Deadlines

### **Wednesday, February 15, 2012**

Unaudited Reporting Forms are due at Center for Resource Solutions (CRS).

### **Thursday, March 1, 2012**

To be pre-loaded into the software system, Participants are encouraged to submit Tracking Attestations from facilities by this date that are registered in an approved electronic tracking system and are being used towards Reporting Year 2011 Green-e Energy Certified sales. A list of facilities that have already been deemed by Green-e Energy Staff to meet the eligibility criteria in the Green-e Energy National Standard can be found online at [http://www.green-e.org/tracking\\_attests\\_recd.html](http://www.green-e.org/tracking_attests_recd.html). Blank copies of the "Tracking Attestation for Electricity and RECs" form to use with tracked facilities are available at <http://www.green-e.org/docs/energy/verif/Green-e%20Energy%20Tracking%20Attestation.doc>.

### **Thursday, March 15 – Wednesday, March 21, 2012**

Beta testing for verification software system. CRS is developing a new software system for verification to be used for Reporting Year 2011, and participants are strongly encouraged to participate in the testing of the software.

### **Monday, April 2, 2012**

Last day to submit repowering or co-firing applications for facilities you hope to use toward RY2011 certified sales. Green-e Energy will rule on these applications no later than Friday, May 4, 2012. Please submit these applications as far in advance as possible, however, since their review can be time intensive.

### **Monday, April 30, 2012**

Green-e Energy will host a webinar for participants in Green-e Energy that sell certified products in order to go over verification materials and to answer questions. Registration details will be provided in advance.

### **May 2012**

Green-e Energy will host one or more conference calls or webinars for auditors working with program participants in order to go over verification materials and to answer questions. Green-e Energy staff will notify participants and any auditors on record in advance of these calls.

### **Tuesday, May 2, 2012**

Participants must submit Tracking Attestations from facilities by this date that are registered in an approved electronic tracking system and are being used towards Reporting Year 2011 Green-e Energy Certified sales. A list of facilities that have already been deemed by Green-e Energy Staff to meet the eligibility criteria in the Green-e Energy National Standard can be found online.

### **Friday, May 25, 2012**

Last day to request an extension to any Green-e Energy rule that affects the supply used toward RY2011 sales. Green-e Energy will respond to extension requests within 3 business days or less in all but the most extreme cases.

You must prove the need for an extension. See the end of this document for a non-exhaustive list of reasons that will NOT be grounds for an extension. The maximum extension is until Tuesday, July 17, 2012, though shorter extensions may be granted. If your request for an extension is granted, you will still be required to upload your completed verification data to the CRS verification software system by July 2, 2012.

If you exceed the due date granted in your extension, the per day financial penalties described below will apply for a period of two weeks or until July 17, 2012, whichever period is shorter. If at the end of this period you have not submitted your Verification Submission, in most cases you will be subject the following consequences:

- Decertification of your certified product(s)
- Having your certified product(s) listed in CRS's *NewSolutions* electronic newsletter and/or a press release to CRS stakeholders as decertified
- Additional actions as described in the Green-e Energy Code of Conduct

**Monday July 2, 2012**

All verification data, the Auditor's Agreed-Upon Procedures Report, all Attestations, all available Tracking System Reports\* and all other required materials must be submitted through the CRS verification software system. Electronic submittal of all documents is required through the verification software system, with the exception of certain Auditor documents, which must be sent as hardcopies.

If you have not submitted all required verification materials by 5pm Pacific Daylight Saving Time (PDT) the name of your company and the product(s) for which verification materials have not been submitted will be posted on the Green-e web site. You will be sent a letter notifying you of your product(s) being out of compliance via electronic mail.

Additionally, starting July 2, 2012, financial penalties (detailed below) will begin to accrue, accumulating at the assigned rate per business day that the Verification Submission is not submitted (excluding July 4<sup>th</sup>). On the day you submit the Verification Submission before 5pm PDT, you will not accrue an additional day of charges. Once your Verification Submission has been received, your total penalty will be calculated and you will be invoiced and sent an advance email with the amount you owe. Payment will be due by Thursday, August 2, 2012. For example, if you are in the \$500 per business day tier, and submit your Verification Submission at 3:30pm PDT on Thursday, July 5, 2012, you will be penalized \$1500.

*Late Fee Daily Rates:*

Late fees are based on the base fees paid to Green-e Energy in 2011. Reference your company's 2011 invoice for your base fees and find the corresponding daily late fee in the table below.

<b>Annual Program Fees</b>	<b>0 - \$2500</b>	<b>\$2501 - \$6999</b>	<b>\$7000+</b>
<b>Daily Penalty</b>	\$100	\$300	\$500

**Tuesday, July 17, 2012**

Absolute last day to submit your Verification Submission by 5pm PDT, if you have not been approved for an extension. This means that the late submittal penalty is capped at ten business days and you will be invoiced for the corresponding amount if you submit materials on this day.

**Tuesday, July 17, 2012**

Green-e Energy will recommend to the Green-e Governance Board that the Green-e Energy certified products for which Verification Submissions have not been received and that have not been granted an extension are immediately decertified.

**Wednesday, August 1, 2012**

Absolute last day that participants that received extensions may submit their Verification Submission, though not all extension requests will be granted a due date as late as July 17. Submitting later than the extension date will cause financial penalties to accrue and described above.

---

\* For Tracking Systems that will not have Reports available by July 2, such as NEGIS and PJM-GATS, Tracking System Reports must be delivered to CRS within 10 business days after the settlement period for first quarter 2012 trading closes. In addition, Participants must notify Green-e Energy of their use of any Q1/2012 renewable MWh in the Agreed-Upon Procedures Report. Tracking System Reports ultimately submitted must match with renewable supply listed in the final version of the data submitted with your Verification Submission.

Additionally, any financial penalties accrued must be paid to CRS by this date. Failure to pay by this date will be noted on the Green-e web site and you will be (re)listed as out of compliance with verification requirements until your check has been received. If you incur financial penalties due to late submission, payment is considered to be part of your Verification Submission, and your Verification Submission will not be considered complete until payment has been made.

#### **Thursday, August 2, 2012**

Green-e Energy will recommend to the Green-e Governance Board that the remaining Green-e Energy certified products for which Verification Submission have not been received be immediately decertified.

Shortly after this date, CRS will send out the summer edition of *NewSolutions* electronic newsletter to all stakeholders, listing all marketers that have had products decertified and that have not yet submitted Verification Submission, even if extensions have been granted.

#### **NOTICE:**

- The auditors listed on the Green-e web site (who have completed at least one complete and satisfactory Green-e Energy audit in the past and wish to be listed) will likely not be able to handle the workload generated by all Green-e Energy participants striving to meet the July 2 deadline. Green-e Energy advises you to retain an auditor as early as possible and begin compiling the necessary documents and sharing them with your auditor as soon as possible.
- If you anticipate needing an extension, please request one as early as possible, and have a way to substantiate your need for an extension. Reasons that extensions will NOT be granted include, but are not limited to:
  - you retained your auditor late;
  - your auditor is too busy as the deadline approaches;
  - you have a large amount of supply or number of sales;
  - you have made a request to Green-e Energy for repowering, co-firing or an exception to Green-e Energy rules and have not been provided a final response.
- If your product(s) are decertified (whether voluntarily or due to disciplinary action), you are still contractually obligated to complete all verification requirements for Reporting Year 2011 and for any Green-e Energy certified sales made in 2012 up to the time of decertification. In the event of the decertification of your product(s), CRS will follow the procedures described in the Green-e Energy Code of Conduct and Customer Disclosure Requirements, which includes, at CRS's option, notifying applicable regulators, consumer advocacy groups and other stakeholders.
- Even if you have been granted an extension, your final verification data are due to CRS on July 2, 2012.
- Green-e Energy will track basic participant verification performance year-on-year (such as late submission) and may make this information available to the public.
- The Green-e Energy Code of Conduct and Customer Disclosure Requirements details additional actions CRS may take in the event of non-compliance with verification requirements.

#### **CRS Contact Information**

Rachael Terada, Project Manager  
Phone: 415-561-2100  
Fax: 415-561-2105  
Email: verification@resource-solutions.org