

Green-e Energy National Standard 2017 Open Comment Period

Green-e® Energy seeks feedback on current and potential future provisions of the *Green-e Energy National Standard* (the “Standard”).

Feedback will be accepted until Monday, March 6, 2017. You may comment directly via email to comments@green-e.org, or through the survey available here:

<https://www.surveymonkey.com/r/CFLJJSQ>

To review the current Standard, visit [Green-e Energy National Standard](#)

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Green-e Energy Call for Comments: Green-e Energy National Standard

Green-e Energy seeks feedback on current and potential future provisions of the *Green-e Energy National Standard* (the “Standard”), specifically regarding:

- Extended Eligibility for Generation Sourced from Shared Renewables
- Geographic Resource Variation for Shared Renewables Supply

Feedback will be accepted through Monday, March 6, 2017. The current Standard and a PDF of the items being reviewed during this Comment Period are available at [Green-e Energy Documents](#) for you to view before completing the survey.

Green-e Energy is North America’s leading certification program for sales and use of renewable electricity and renewable energy certificates (RECs) made in the voluntary market for renewable energy. Created in 1997, Green-e Energy provides oversight to voluntary renewable energy sales, certifying the majority of all retail voluntary renewable energy sales in the U.S.

The *Green-e Energy National Standard* was developed through an open stakeholder process in 2004 and 2005, and grew out of regional program standards in place between 1997 and 2004. Periodically, the Standard is assessed to determine if any changes should be made to adapt it to the evolution of the voluntary renewable energy market.

If you need to pause while taking the survey (for example, to look up information), you may resume at any time up to 11:59 p.m. Pacific Time on Monday, March 6, by using the link that directed you to this page, provided you do so from the same computer and browser. You may also go back and change your answers at any time prior to clicking “Submit Survey Responses” at the end of the survey.

Thank you for your time and consideration as you provide comments.

NOTE: Although contact information is requested in this survey, it is not required to complete the survey. However, we would appreciate your contact information, as it will help us if we have follow up questions for you. We will not distribute or post your name, company, or contact information; it will only be used for follow-up related to the Standard.

Throughout the questions, text additions to Standard language are underlined; Deletions are designated by ~~strikethrough~~.

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1. Geographic Resource Variation and Extended Eligibility for Generation Sourced from Shared Renewables

In response to the quickly developing Enhanced Community Renewables (ECR) Programs offered by California's three largest investor owned utilities (IOUs) and due to the increasing number of providers who wish to make shared renewables programs available to their customers, Green-e seeks feedback on potential exceptions in the Standard for shared renewables programs in order to align with the requirements of these programs:

- a. This proposed rule would allow "shared renewables" programs to have an exception to the definition of "single mix" resources found in other parts of the Standard. Green-e Energy rules currently require that products delivered to residential customers qualify as a single mix product. Single mix is defined in the Green-e glossary as a product "for which all customers receive one unique resource mix (a fixed combination of resource types, proportion of each resource type, and generation location)." Many shared renewables programs allow for the generation location of customer's purchases to vary, as different customers may sign up to receive output from smaller individual generation facilities. For instance, in California, the Enhanced Community Renewables (ECR) products created by each of the CA IOUs under order of the CPUC require that customers sign up to receive output from specific facilities.

In October 2015, the Green-e Governance Board voted to allow a 1-year exemption for Participants selling these kinds of products to specify the specific facility providing the electricity to the customer, within the single-mix product type. The proposed language would extend a permanent exception and does not allow for variations in resource type.

- b. In addition, this proposed Standard change would allow shared renewables programs an exception to the "New Date" eligibility requirements as defined in Section II.E of the Green-e Energy National Standard. Green-e has received feedback from shared renewables program administrators that their programs are typically built around an expectation that the renewable energy will be delivered beyond 15 years. In addition, the ECR programs require facilities' output to be included in a Green-e Energy certified product for up to 20 years. Green-e's current rules would prevent these facilities from providing eligible supply in the last 5 years of the contract. The proposed language therefore includes an exception that allows expanded eligibility for supply generated by new resources created to serve shared renewables programs. The exception would allow these facilities to provide certified renewable energy to customers for up to 30 years, under limited circumstances. Although the use is similar to supply that currently receives an exception under the Long-Term Contracts rule within National Standard Section II.H, the generation from a shared renewables program is ineligible under this Section because it may serve residential consumers. Green-e has also received feedback that shared renewables programs are unlikely to succeed if all customers are required to enroll for the full

20 years. As such the language presented for review allows for the replacement of off-taker contractees within the eligibility window. A new Section IV.C would allow for this added flexibility for Shared Renewables supply only.

Comments are requested on proposed section IV.C:

IV. C. Programs Contracting Supply from Portions of Specific Facilities to Individual Customers

Some participants offer products where customers (residential and non-residential) can enroll to purchase renewable electricity from a portion of a specific generating unit. In these cases, the Participant selling a Green-e Energy certified product might have multiple generating units for which different customers have enrolled to purchase portions of output. For instance, half of the customers are enrolled to purchase portions of the output from Solar Farm A and the other half are enrolled to purchase portions of the output from Solar Farm B. In these cases, Green-e Energy waives the requirement to provide all customers of Single Mix products renewable energy from the same facilities. In such cases, the Participant may alter the specific facility providing electricity to the customers, but not the resource type. A program of this type is a unique certified product requiring a contract with CRS, fee assessment and annual verification.

- 1) In order to qualify for Green-e Energy certification under this program model, all of the below criteria must be met:
 - a. The product must be structured such that each customer signs up to purchase renewable energy entirely from one specific generating unit;
 - b. Any one customer cannot enroll for 100% of a facility's output;
 - c. The product purchased by each customer must contain the same resource type. Each customer's purchase may vary as to the source facility within a resource type, but all customers must receive the same overall resource type.

- 2) In certain cases, Green-e Energy will certify the sale of renewable electricity from facilities used in these products for more than the 15-year "New Date" window described in Section II.E, above, and up to 30 years. All criteria below must be met in addition to criteria IV.C.1.a-c.
 - a. The exception for any one facility can be no longer than the contract period for which the Participant has committed to purchase renewable electricity or RECs;
 - b. The product must be made available to residential customers;

If Yes, are there any restrictions that should be placed on the frequency or timing allowed under the new rule?

5. Do you have any other feedback you wish to share regarding these proposed changes?

2. Conclusion

Thank you for your comments. Green-e Energy will compile your responses for the consideration of the Green-e Governance Board, which will discuss and vote on whether to support edits to the *Green-e Energy National Standard*.

Thank you for your participation.

If you would like to reach us directly with questions or additional comments, please write to comments@green-e.org.