

First Comment Period for "Green-e Renewable Energy Standard for Chile"

Introduction

Open Comment Period for Green-e Chile Documents:

-Green-e Renewable Energy Standard for Chile, Version 1.0.A

-Terms of Reference for the Green-e Renewable Energy Standard for Chile, Version 1.0.A

Center for Resource Solutions (CRS) seeks feedback on the Green-e Renewable Energy Standard for Chile (the "Standard"), which sets eligibility criteria for the certification of renewable energy sales and use in Chile.

The Terms of Reference ("TOR") for the Standard is also open for review and comment. The TOR outlines the goals and impacts of the Standard in Chile and provides a needs assessment for Green-e certification being available in Chile.

Drafts of the Standard and TOR, along with a PDF copy of the following survey, are available on the Green-e website at www.green-e.org/chile (opens in a new window) for you to view before completing the survey. This page also contains information on the Green-e Framework for Renewable Energy Certification (the "Framework") and how the Standard operates as a Regional Standard under the Framework.

Feedback on both the Standard and TOR will be accepted until 11:59pm Chile Time on Monday, December 24, 2018 (6:59pm Pacific Standard Time). You may submit feedback through the following survey or by emailing written comments to comments@green-e.org using the subject "Chile Standard Comments". If you are submitting written comments, please review the survey PDF for the specific questions on which we are seeking feedback. Comments are also welcome on any part of the Standard and TOR.

Center for Resource Solutions, an NGO based in California (USA) that administers the Green-e certification programs, will use feedback from this comment period to create a revised draft of the Standard, which will be released for a second comment period, planned for February 2019.

Posted on October 26, 2018

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Respondent Background

* 1. What type of organization do you work for? Check all that apply.

- Investor-owned electric service provider
- Co-op electric service provider
- Municipal electric service provider
- Electric service provider in a deregulated electricity market
- Generation Facility Owner / Operator
- Energy project developer
- Energy investor / financier
- Energy attribute certificate seller / marketer / aggregator
- Energy attribute certificate or renewable energy purchaser
- Environmental non-profit
- Other Non-profit or industry organization
- Local government
- Provincial / State Government
- National Government
- Other: please describe

* 2. Where do you operate? Please select all that apply.

- Chile
- South America, one or more countries other than Chile
- North America
- Globally
- Decline to state
- Other location(s) of operation, if none of the above apply:

3. Although your contact information is not necessary to complete the survey, providing your contact information will help us if we have follow up questions for you. We will not distribute your contact information; it will only be used for our own follow-up related to this survey, the Standard, and the TOR. By providing your email address, you are consenting to being contacted for such follow-up.

Name	<input type="text"/>
Company	<input type="text"/>
City/Town	<input type="text"/>
Country	<input type="text"/>
Email Address	<input type="text"/>

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Survey Format and Organization

This survey is designed to collect your feedback at the level of detail you wish to provide and does not require you to click through all of the sections in order to submit your feedback. Green-e appreciates your detailed thoughts, and so the more information you can provide, the stronger and more impactful the Standard will be.

On the following page, you will be able to write in any general comments you have on the Standard and on the TOR.

CRS also seeks feedback on several specific questions about the Standard, and these will be asked after the general comments page. If you only wish to provide general comments, you may skip these questions.

Following the specific questions, you may enter any final or section-specific comments you have. These comments are also optional and may be skipped, but section-specific comments will allow you to offer very targeted feedback on language, intent, and details of individual rules.

To view the Standard, the TOR and the PDF of this survey that contains specific questions for which we are seeking feedback, please visit <http://green-e.org/chile> (opens in new window).

Thank you very much for offering your feedback to help advance credible renewable electricity use and certification!

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General Comments on the TOR and Standard

4. Please enter all comments you have regarding the Terms of Reference in the comment box below. This is the only section of the survey in which to provide feedback on the Terms of Reference.

5. Please enter any general comments you have about the Standard here. Keep in mind that if you choose to continue to the next sections of this survey you will be able to provide much more detail and may wish to skip this general comments box. However, you are welcome to only provide comments in this box without continuing to the more detailed sections that follow.

* 6. Do you wish to continue to the detailed questions on the Standard? If you select "No" you will be taken to the final page of this survey where you may submit your responses.

- Yes, continue to the detailed questions
- No, skip to the final page of the survey

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II.B.5 Means of Renewable Energy Procurement and II.C Customer Types

7. Do you expect electricity distributors to offer renewable electricity to their retail customers? (As opposed to customers needing to buy directly from a generator) If so, please say when this service might be available and any other details you think are relevant or helpful.

Yes

No

Please add comments here

8. Do you expect residential customers to be able to choose renewable electricity? If so, when?

Yes

No

Please add comments here

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III.A. Renewable Resource Types

9. Which renewable resource types should be added, deleted, or changed in this section? Please offer specific suggestions and your reasons for the suggestions.

10. Should the Chile Standard include hydropower? Green-e typically requires that hydropower meets extra sustainability criteria, and so if you support hydropower being eligible in Chile please provide information on what extra criteria should be included for hydropower. For example, a separate certification for hydropower generators that is already supported in Chile, or a set of criteria already developed by an international sustainability organization.

Yes

No

Please add comments here

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III.B. Vintage of Eligible Renewable Generation

To comply with international best practice, renewable electricity should be generated close to the time it is claimed toward the purchaser's carbon footprint and electricity consumption profile. In effect, renewable electricity generation has a "shelf life" so that, for example, a customer consuming electricity in 2020 cannot claim to use renewable electricity if they bought Environmental Attribute Certificates (EACs) that were generated in 2015. In the draft Chile Standard, Green-e allows some flexibility between the date of generation and the date a consumer claims to use the renewables, to account for the seasonality of some renewables and to allow for consumers to "true up" their purchasing once they know their total electricity use for a given year.

11. Are there any laws, systems, or practices that would require that EACs generated in a particular month must be retired or used within a certain period of time? Please provide details. One theoretical example might be if a renewable electricity tracking database limited the sale of EACs to within 15 months of their generation.

12. How soon before or after renewable electricity is generated do you think it should be claimed by an electricity consumer? What should the "shelf life" be?

- The consumer should be able to use renewables generated up to 6 months before the year of use, during the year of use and/or up to 3 months following the year of use
- The consumer should use generation from the same year that the renewable electricity use claim is made
- Other, please explain

Please add comments here

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III.C. Generator Age and "New Date"

One of the goals of the Standard is to encourage the development and use of new renewable electricity generation by facilitating the growth of customer demand for high quality, impactful renewables. One way to do this is by limiting the age of eligible generators.

13. What is the earliest year that you think a generator should be allowed to have first delivered renewable electricity to the grid, in order to be eligible for Green-e? Or put another way, how many total years should a new generator be eligible for use in Green-e certified sales? Please provide your reasoning.

14. Are there any exceptions or variations to the "online date" limit you selected above? For example, that a certain type of generator should be allowed to be older, or that certain actions taken by an older generator after the selected year should allow it to qualify for Green-e or that long-term contracts should be recognized even if they extend beyond the maximum generator age in the Standard. Please provide your reasons for why certain generator or contract types should be treated differently.

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III.D.2.a. and III.D.2.b. a. Renewable Energy Products that are sold or used by the Participant

15. What (if any) changes or comments related to these criteria? Please explain the reasons for your suggested changes.

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IV.A.2. Carbon Legislation

These questions relate to Chile's carbon tax, which is paid by large fossil fuel generators for each ton of carbon dioxide emitted.

16. Are emitters able to procure *Energia Renovable No Convencional* (ERNC or Non-Conventional Renewable Energy) compliance certificates in order to avoid the tax? CRS has been told that this is being discussed as something that could be possible in the future.

- This is possible now
- This is likely to be possible in the future
- This is unlikely to be allowed

Please add comments here

17. Are you aware of any other current or likely future interactions between the carbon tax and renewable electricity generation or use?

- Yes
- No

Please add comments here

18. Are there any ways in which you think the tax and renewables should interact?

- Yes
- No

Please add comments here

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IV.B.1 and 2. ERNC Law and Electricity Auctions

The ERNC Law requires that generation companies deliver an increasing amount of qualifying renewable electricity to the grid. At the moment, the amount of qualifying renewable electricity on the grid is more than double the current ERNC requirement.

19. Do you think that a MWh used for ERNC compliance should also be eligible for use in a Green-e Energy certified product? Please explain in detail, including whether and how ERNC energy is currently being used to substantiate retail renewable electricity use claims.

Yes

No

Please add comments here

20. Generators can bid to supply electricity to Regulated customers, with winners selected based on price. Do you think that generators built under winning bids should be eligible to supply electricity to a Green-e Energy certified Renewable Energy Product? Please provide details supporting your position.

Yes

No

Please add comments here

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V.B. Use of Renewable Energy Tracking Systems

At the moment, consumers are purchasing renewable electricity in various ways in Chile, and a single consistent method is being discussed.

21. Given the current state of purchasing and the direction that purchasing practices are moving, do you think that the use of a renewable energy tracking system should be required in all cases in Chile? Please explain your reasoning and which systems or methods of purchasing should be used. As purchasing mechanisms change, the Green-e Chile Standard can adapt.

Yes

No

Please add comments here

22. Other than the I-REC tracking system being available in Chile, are you aware of any renewable energy tracking systems under development in Chile, or that may serve the Chilean market soon? Please provide as much detail as possible.

Yes

No

Please add comments here

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V.C. Customer Disclosure

23. What specific issues do you see in Chile related to renewable electricity marketing, consumer disclosure of electricity purchasing, or related areas? Please include links to any relevant information.

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Other Sustainability Criteria and Final Comments

24. Are there any other important factors in the sustainability of renewable electricity in Chile that should be considered for inclusion in the Chile Standard, such as the impact on certain groups of people, other ecological impacts of certain resource types, other social impacts, interconnection with other countries, or anything else?

25. Do you have any other comments or feedback about any remaining part of the Chile Standard?

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Submit Responses

Thank you for your time and thoughts! You are helping CRS develop a strong and impactful Green-e Standard that reflects the needs of Chilean stakeholders, as well as helping Chile accelerate the development of renewable resources and a robust renewable electricity market.

If you are satisfied with the answers you have provided, please click "Finish and Submit Responses" below. Once you do, you can no longer edit your responses.

If you would like to edit any responses before sending them to CRS, please click "Previous Page" through the survey to reach the desired question, edit your response(s), and click "Next Page" until you return to this page, then click "Finish and Submit Responses". Please remember to submit responses by December 24, 2018.

We hope that you will participate in the second comment period for the revised draft of the Green-e Renewable Energy Standard for Chile, which is scheduled to begin in February 2019.

Thank you!