

Green-e Energy requirements for utilities to support renewable energy project developer communications about the California Enhanced Community Renewables program

Green-e Energy provides the following guidance to utilities participating in the California Enhanced Community Renewables (“ECR”) program to help them successfully communicate with consumers in compliance with Green-e Energy guidelines. Green-e Energy expects that utilities will take the information contained here and use it to create communications that accurately describe their new programs, their responsibilities to consumers, and response mechanisms for consumers seeking additional information.

CALIFORNIA UTILITY SECTION

Summary of utility responsibility (in addition to other requirements of the California ECR Programs and Green-e Energy certification obligations):

- 1. Create a webpage for renewable energy project developers (“developers”) participating in the California ECR Program. This webpage must be live before the utility approves any developer’s marketing materials.**
- 2. Create a webpage for customers buying electricity from developers. This webpage must be live by the time the first PPA is signed by the utility with a developer participating in the ECR program.**
- 3. Collect the developer’s marketing materials and updates and coordinate with Green-e Energy to review and ensure they meet Green-e Energy requirements.**
- 4. Develop a formal process for tracking and enforcing developer non-compliance.**
- 5. Provide required customer disclosures.**
- 6. Complying with and enforcing other requirements of California ECR programs. Green-e Energy’s responsibilities are limited to approval of developer marketing materials and utility conduct as complying with Green-e Energy’s program requirements.**

Responsibility details:

- 1. Utility’s developer-facing page must include the following:**
 - a. Listing of Green-e Energy’s and utility’s requirements. These requirements may be interspersed with other, non-Green-e, requirements.**
 - i. Language explaining ECR program and Green-e Energy certification. Optional language:**

1. Under Senate Bill 43 (SB43), [*Utility Product Name*] is required to be Green-e Energy certified as administered by the nonprofit Center for Resource Solutions. [Green-e Energy](#) is North America's leading voluntary certification program for renewable energy. Since 1997, Green-e Energy has certified renewable energy that meets environmental and consumer protection standards that it developed in conjunction with leading environmental, energy and policy organizations. Green-e Energy requires that sellers of certified renewable energy disclose clear and useful information to potential customers, allowing consumers to make informed choices. Green-e Energy Certification provides consumers with assurance that the product sold under the [*Utility Product Name*] meets the Green-e Energy National Standard, is not double counted, and is marketed in a clear and accurate way to customers.

Under the California Enhanced Community Renewables program, renewable energy project developers take on the responsibility for marketing their renewable project(s) directly to customers, and as such agree to comply with Green-e Energy environmental and consumer protection standards. This compliance includes following Green-e Energy guidelines on all product marketing and an obligation to provide the end-use customer with accurate and sufficient disclosures regarding the project(s). For more information on Green-e Energy developer requirements under SB43, please visit [Green-e Energy's California Enhanced Community Renewables Information](#).

- ii. Details on the developer participation requirements, including a link to the Green-e developer-facing page www.green-e.org/ecr.
 1. Developer will create draft marketing language in compliance with the requirements.
 2. Developer will submit all marketing materials to the utility for review, including proposed webpage(s) (as described in the developer webpage requirements in 'Green-e Energy requirements for developers participating in the California Enhanced Community Renewables (ECR) program'), and include the Green-e ECR Developer Cover Sheet (both documents available at: <https://www.green-e.org/programs/energy/documents>). Only complete submissions will be accepted.
 3. The utility must approve the developer's marketing in writing before the developer begins marketing to potential customers. This must include written approval regarding Green-e requirements.
 4. Developer will submit a Green-e Energy Tracking System attestation for each renewable energy facility. The developer will complete, sign and return the Green-e Energy Tracking Attestation for Electricity and RECs. This is a recurring obligation as attestations expire every few years.

Information about Green-e Energy attestation forms can be found here: <https://www.green-e.org/programs/energy/documents>. The Green-e Tracking Attestation can be downloaded directly via this link: <http://www.green-e.org/docs/energy/verif/Green-e%20Energy%20Tracking%20Attestation.docx>.

5. Developer will annually procure any Host Attestations as required by Green-e Energy. ¹ If a generation facility is located on-site with an electricity user (e.g. rooftop system), the developer agrees to procure Green-e Energy Host Attestations from any host (the electricity consuming location on which the generation facility will be constructed). Upon facility operation, the developer agrees to notify all tenants of the host building of the amount of renewable energy that the building and tenants are using from the facility. If none of the RECs are delivered to the host, the developer and any subsequent generator agree to notify all tenants that “no renewable electricity is used onsite”.
6. Developer will distribute Welcome Packets to all customers within 60 days of signed Customer-Developer Agreement and annually at re-enrollment.
7. Developer will submit marketing materials for prescreening or review, if requested by the utility or Green-e Energy.
8. Developer will execute any Green-e Energy or the utility requested changes and customer disclosures within 30 days.

2. Utility’s retail **purchaser-facing page** must include the following:

- a. List of developers that have signed power purchase agreements (PPAs) (to be updated within a reasonable time after a developer has signed the PPA)
 - i. Contact information for developers that have signed a PPA or link to their website
- b. Utilities’ alternative system mix. This constitutes the resources that the customer would receive if not participating in a green tariff program.
- c. Explanation of the process for dealing with developer non-compliance (section 4 below).
- d. Information about the ECR program, outlined in Customer Disclosures in section 5 below. Specifically, these will detail what the utility is responsible for and what the developer will be providing the customer (pricing, billing, and cancellation process must be described).
- e. Green-e Energy logo with language, link to Green-e, Green-e Energy contact information, & information about Green-e Energy certification:
 - i. “Green-e Energy is North America’s leading voluntary certification program for renewable energy. Since 1997, Green-e Energy has certified renewable energy that meets environmental and consumer protection standards that it developed in conjunction with leading environmental, energy and policy organizations. Green-e Energy requires that sellers of certified renewable energy disclose clear

¹ Please note that the Host Attestation is currently under development by Green-e Energy and will be released by January 2016.

and useful information to potential customers, allowing consumers to make informed choices.”

- f. Required information about Green-e for Business and Products:

“Green-e for Businesses and Products is committed to helping Green-e Energy customers tell their sustainability stories. For over a decade, Green-e has been working with leading companies and products that use renewable energy and equipping them with recognition, promotional, and communication tools to market their sustainability efforts to customers and stakeholders. Green-e currently certifies companies, facilities, products, electric vehicles, printing and paper supply, and events. For more information on Green-e’s business and marketing solutions e-mail marketplace@green-e.org or call 415-561-2100.”
3. **Utilities must work with Green-e to review developer marketing** to ensure compliance with ‘Green-e Energy requirements for developers participating in the California Enhanced Community Renewables (ECR) program’ (“Green-e Developer Requirements”). Utilities are required to submit the developer marketing materials (and any updates) for review by Green-e Energy staff at the time that they are received, as well as during the annual Green-e Energy verification process. Utilities must approve a developer’s marketing materials in writing after receiving approval regarding Green-e program compliance from Green-e Energy staff. The utility’s approval must specify whether the developer is approved for Phase 1 or Phase 2 marketing (See Green-e Developer Requirements available at <https://www.green-e.org/docs/energy/ECR%20Developer%20Requirements.pdf>).
4. **Utilities must develop a formal process for tracking and processing developer non-compliance**, including complaints from customers regarding the developers.
 - a. Create an avenue for customers to report developer misconduct (i.e. phone number or email address). Misconduct includes inaccurate pricing information, misleading advertising, and non-compliance with any other marketing requirements outlined in Green-e Developer Requirements.
 - b. Formalize a process for dealing with marketing misconduct once reported, including a process for terminating a project’s participation in the certified product should a developer not comply with Green-e requirements.
 - c. Utility must report to Green-e Energy if and when any project is removed from the certified product.
5. **Customer Disclosures** must be posted on the customer-facing website, as well as sent to customers within 60 days of enrollment (i.e. when the customer will begin to receive a bill credit from the utility) and re-submitted annually at re-enrollment.
 - a. Brief description of program / relationship between the utility and the developer, and who will be billing the customer for service.
 - b. Clarification about cancellation process, specifically that cancellation requests should go through the developer.
 - c. Pricing information, specifically how the utility credit is calculated.

- d. Specification of the default electricity mix, including the source.
- e. These “Customer Disclosures” must be sent to customer within 60 days of enrollment (i.e. when the customer will begin to receive a bill credit from the utility), and re-submitted annually at re-enrollment.

For more information, please contact Green-e Energy at 415-561-2100 or ecr@green-e.org.