



## Reporting Year 2024 Annual Verification Submission Timeline and Deadlines

The timeline below outlines the major events and deadlines involved in the annual process to verify Green-e® Energy certified sales made during calendar year 2024 (“Reporting Year 2024” or “RY2024”). It is up to Green-e® Energy participating companies to meet all relevant deadlines and to undertake whatever internal processes are necessary to meet such deadlines.

The Green-e® Energy verification software is slated to be made available to Participants for RY2024 during the second week of March 2025, and deadlines after that are all based on this expected software release. If the software release date is later than expected, Green-e® Energy will revise and re-circulate this document to program participants active in 2025. The most up-to-date version of this document is always available on the Green-e® Energy Participant Portal at <https://www.green-e.org/energy-portal>.

### Training Webinars will be posted on Green-e® Energy Portal

Green-e® Energy staff will record a series of webinars for sellers of Green-e® Energy certified products and their auditors. These webinars provide: instructions to Participants who will be using the Bulk Upload tool to enter their data into the verification software; instructions to sellers on how to use the verification software and a review of materials needed to complete the process; and instructions for Auditors completing an agreed upon procedures report on behalf of Participants on how to use the software and a review of materials needed. These training webinars are highly encouraged for Participant staff that are new to the Green-e® verification process as well as any staff who have not seen the new software. Auditors are required to attest to having viewed the auditor training materials before they can submit a Participant’s verification submission to CRS.

### Monday, February 17 2025

Participants are encouraged to submit by this date copies of the Tracking Attestation for Electricity and RECs (“Tracking Attestation”) from facilities that are registered in an approved electronic tracking system and are being used towards RY2024 Green-e® Energy certified sales, in order to have facility information pre-loaded into the software system. A list of facilities that have already been screened and approved by Green-e® Energy staff is accessible online by Green-e® Participants at <http://www.green-e.org/tracking>. To submit a Tracking Attestation form to Green-e® Energy program staff, please find the form at the top of the CRS Listed webpage: <https://www.green-e.org/sfdc/reports-data.php>.

*Please note:* The fee for submitting a Tracking Attestation will increase to \$225 per facility after February 17, 2025.

### Friday, February 28, 2025

Unaudited Reporting Forms are due at Center for Resource Solutions (“CRS”). A blank copy of this form is available at on the Green-e® Energy Participant Portal at <https://www.green-e.org/energy-portal>.

Product Mix Change Forms are also due at CRS for participating renewable energy sellers who changed a certified product’s mix at any time during RY2024 in such a way as to constitute a “substantial difference”. A change is considered “substantial” if any of the below are true:

1. The type or proportion of renewable resources changes by greater than four percentage points of the certified product’s mix,
2. A geographic location of generation, such as a state or region, is added or removed from the mix, or
3. A resource is removed from or added to the supply.

This form is available on the Green-e® Energy Portal: <https://www.green-e.org/energy-portal>.

### Monday, March 17 2025

Reporting Year 2024 Annual Verification Submission Timeline and Deadlines

Last day to submit repowering or co-firing applications for facilities you hope to use toward RY2024 certified sales. Green-e® Energy staff will attempt to rule on these applications no later than Friday, May 2, 2025. Please submit these applications as far in advance as possible as their review can be time-intensive. Application forms are available on Green-e® Energy Portal: <https://www.green-e.org/energy-portal>.

### **Friday, May 2, 2025**

Last day to request an extension to the June 2, 2025 verification submission deadline. Green-e® Energy will make every reasonable effort to respond to extension requests within 3 business days.

You must prove the need for an extension. See the end of this document for non-exhaustive lists of reasons that may and may NOT be grounds for an extension. The maximum extension is until Wednesday, July 2, 2025, though shorter extensions may be granted. If your request for an extension is granted, your Auditor will perform and report on an additional audit step of checking that renewable MWh purchases were delivered to you by June 2, 2025.

If you exceed the deadline granted in your extension, the per-day late fees described below will apply for a period of up to 30 calendar days. If at the end of 30 calendar days you have not submitted your Verification Submission, you will be subject to the consequences outlined in the “Wednesday, July 2, 2025” entry below.

### **Monday, June 2, 2025**

All verification data, the Auditor’s Agreed-Upon Procedures Report, all Attestations, all available Tracking System Reports<sup>1</sup> and all other required materials must be submitted through the Green-e® Energy verification software system by 11:59pm Pacific Daylight Saving Time (PDT). All supply must be finalized, delivered to you, documented through attestations / tracking system reports, and audited by this date; a specific list of documents and data comprising a complete and acceptable report will be provided in Appendix B of the RY2024 Getting Started Guide when released. Electronic submittal of all documents is required through the verification software system (which will be made available in March). If a specific extension or separate deadline has been provided by Green-e® Energy staff, refer to the related section of this document or communication from Green-e® Energy on the matter.

#### *If Verification Materials are Provided to CRS Late:*

If you have not submitted all required verification materials by 11:59pm 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® website. You will be sent a letter notifying you of your product(s) being out of compliance in accordance with your contract for Green-e® Energy certification.

Your Auditor will perform and report on an additional audit step of checking that all renewable MWh purchases were delivered to you by June 2, 2025. The Agreed-Upon Procedures report will not be accepted after June 2, 2025 without this step being performed and documented.

Additionally, starting at 12:00am PDT on June 3, 2025, late fees (detailed below) will begin to accrue, accumulating at the assigned rate per business day that the full Verification Submission is not submitted. Once your Verification Submission has been received, your total late fee will be calculated, and you will be invoiced. Payment will be due within 30 calendar days of the invoice. Failure to pay by this date will be noted on the Green-e® website, and you will be re-listed as out of compliance with verification requirements until your payment has been received. If you incur late fees 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. If payment is not received within 30 days of the issuance of the invoice you will be considered in breach of contract with CRS as of

---

<sup>1</sup> For Tracking Systems that will not have certain Tracking System Reports available by June 2, 2025 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 2025 trading closes. In addition, Participants must notify Green-e® Energy of their use of any affected Q1/2025 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.

that date. Remaining in breach of contract for 30 calendar days will result in decertification for all certified products for which late fees have not been received.

Companies that file late will pay a daily base late fee of \$200, plus a daily volumetric fee based on the total volume of all certified sales (wholesale and retail) made in RY2024, as detailed in the table below. Fees will continue to accrue through the 30-calendar day period, but the fees will be assessed based on the number of business days late. Late fees are capped at 3.5 times the amount of Green-e® certification fees invoiced for the Product at issue for the calendar year that verification materials are due.

*Late Fee Schedule:*

**Table 4. Fees for Late Submission of Annual Verification Materials, Cumulative, for All Product Types**

<b>Business Days Late, up to 30 calendar days late, applies to all products</b>	<b>Base Late Fee, per Business Day</b>	<b>Per MWh Late Fee, per Business Day</b>
Each business day	\$200	\$0.0008

A spreadsheet that calculates specific late fee volumes based on an input sales volume amount can be downloaded on the Green-e® Energy Participant Portal at <https://www.green-e.org/energy-portal>.

### **Wednesday, July 2, 2025**

Absolute last day for your Verification Submission to be submitted to Green-e® Energy, by 11:59pm PDT, if you have not been approved for an extension. Submitting later than 11:59pm PDT on the extension deadline will cause late fees to accrue as described above for 30 calendar days, after which the product may be decertified.

Green-e® Energy certified products for which Verification Submissions have not been received and that have not been granted an extension are immediately decertified. If your product(s) is decertified, you are still contractually obligated to complete all verification requirements for Reporting Year 2024 and for any Green-e® Energy certified sales made in 2025 up to the date of decertification. In the case of decertification, CRS retains the right to seek remedies including those described in the Green-e® Energy Code of Conduct and Customer Disclosure Requirements (“Code of Conduct”) (e.g. notifying customers, state Attorneys General, the Better Business Bureau, and other legal action). You will not be authorized to offer any new Green-e® Energy certified product starting on the date of decertification for a period of at least 12 months, unless you obtain approval from the Green-e® Governance Board. See Section V of the Code of Conduct.

### **Friday, August 1, 2025**

Absolute last day that participants that received 30-day extensions may submit their Verification Submission to Green-e® Energy without product decertification. Not all extension requests will be granted a 30-day extension. Late fees will accrue for every business day passed from the submission deadline to this date.

### **Autumn 2025**

CRS will send out the autumn edition of the CRS NewSolutions electronic newsletter to all stakeholders and may include a listing of all products decertified for failure to submit verification materials, and the corresponding sellers. CRS reserves the right to communicate decertification through other channels and to other parties at its sole discretion.

**NOTICE:**

- The auditors listed on the Green-e® website (who have performed 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 June 2, 2025 deadline. CRS 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 may be granted include:

- Natural disasters / acts of God;
- Death or serious illness of key personnel or lead audit staff;
- Verification software tool errors / bugs beyond your control that Green-e® Energy staff have determined prevent completion of verification;
- A dispute about a supply contract that is beyond your control where you can demonstrate to Green-e® Energy staff that you have taken all possible steps to procure the supply prior to verification deadlines.

Reasons that extensions will NOT be granted include, but are not limited to:

- Late retention of auditor;
  - Inadequate staff resources dedicated to completing verification;
  - Your auditor is too busy as the deadline approaches;
  - A large amount of supply or number of sales;
  - A request to Green-e® Energy staff for repowering, co-firing or an exception to Green-e® Energy rules has been made and a final response has not been provided.
- If your product(s) is decertified (whether voluntarily or due to a contract enforcement action), you are still contractually obligated to complete all verification requirements for Reporting Year 2024 and for any Green-e® Energy certified sales made in 2025 up to the time of decertification. You will no longer be authorized to offer a Green-e® Energy certified product starting on the date of decertification for a period of at least 12 months, unless you obtain approval from the Green-e® Governance Board. See Section V of the Code of Conduct. The Code of Conduct details additional actions CRS may take in the event of non-compliance with verification requirements, and in the event of the decertification of your product(s) due to non-compliance with verification rules, CRS will follow the procedures described in the Code of Conduct, which includes, at CRS's option, notifying applicable regulators, consumer advocacy groups and other stakeholders.
  - Green-e® Energy will track participant verification performance year-on-year (such as late submission) and may make this information available to the public.

**CRS Contact Information**

Green-e® Energy Staff

Email: [verification@green-e.org](mailto:verification@green-e.org)