



# FTC Green Guides and Renewable Energy Marketing

Thursday, November 17th, 2011

## The Voice for Renewable Energy Markets

- Dedicated to maintaining and growing strong markets for renewable energy
- Represent: renewable energy marketers, utilities, equipment manufacturers, project developers and others supportive of renewable energy markets

### Policy + E&O:

- 5-Year Renewable Energy Pledge
- Secured AB32 VRE set-aside
- Null Power; prevented REC double counting
- Secured “do no harm” provision in Kerry-Lieberman “American Power Act”



Our mission is to improve the climate for  
doing business in the renewable energy industry.

## Leaders in renewable energy markets across North America:



To Join REMA:

[www.renewablemarketers.org](http://www.renewablemarketers.org)

Booth #6

# Community Energy

*Building a Clean Energy Future*

- Clean energy market pioneer
- Experienced wind and solar developer
- Clean energy supplier to
  - 115,000+ residences and businesses
  - 22 utility green power programs





# Presentation Outline

- Background and Overview
- RECs vs. Renewable Energy
- Product Claims
- On-site Renewable Energy

# Background

- Green Guides created in 1999
  - No discussion of Renewable Energy in original
- Revision process began in 2008
- Expected release in early 2012



# REMA Involvement

- Attending series of workshops
- Comments each step of the way
- Recent face-to-face meeting with FTC

**REMa**  
Renewable Energy Markets Association

# FTC Mandate

- Protect consumers from deceptive marketing
- Deceptive if the average consumer would see message as deceptive
  - “Truth” is irrelevant
  - Perception is key
- If message is not material to consumers then not deception



# Overview of Renewable Energy Claims

- Focus on secondary marketers
  - Product manufacturers
  - Retailers, etc.
- No direct focus on RE marketers or utilities



# RECs vs Renewable Energy

- “no reason to believe” purchasing RECs vs. Renewable Energy “would be material to consumers”
- “made with renewable energy” = powered with renewable energy or conventional energy offset by renewable energy certificates

# Product Claims

- No unqualified renewable energy claims if fossil fuels used to manufacture **ANY** part of advertised item or **ANY** part of advertised service.
- Must specify source, i.e., Solar or Wind
  - 28% said “made with renewable energy” implies product made with renewable materials
  - 21% said “made with renewable energy” implies made from recycled materials

# On-Site Renewable Energy

- “Hosting solar” is deceptive
- 62% said company used solar or wind power

