

3DEGREES

Consumer Protection and Solar Claims

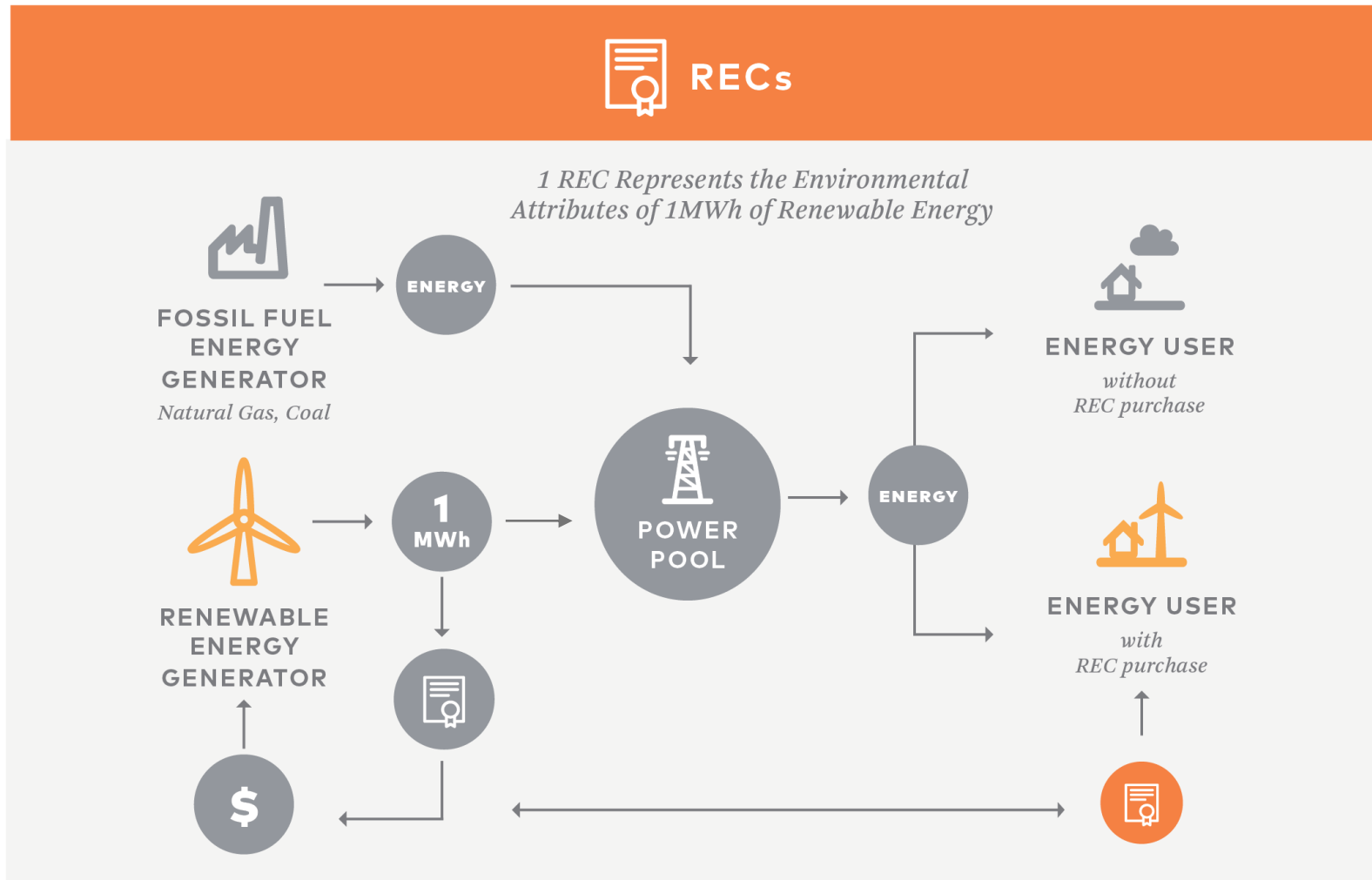
PRESENTED TO:

REM 2017

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RENEWABLE ENERGY CLAIMS

What is a REC



RENEWABLE ENERGY CLAIMS

Claims Enforcement



Communicating the value of solar energy

How is the value of SRECs communicated to customers by utilities and developers?

- + Example program title: *“Solar Loans Program: Going Solar with Your Utility”*
- + Incentive for solar
- + A way to make extra money

Rarely as a representation of 1 mWh of solar energy and integral to renewable energy usage.

Example SREC Price Signals

STATE	2017 Prices
Massachusetts (II)	~\$270/MWh
Washington D.C.	~\$470/MWh
New Jersey	~\$220/MWh

Voluntary-Compliance Market Interaction: The importance of a clear dividing line

- + Voluntary market can be a key tool to achieving statewide renewable energy goals
- + ...but be careful not to undermine it
 - + **Example:** distributed generation counted toward Arizona's REST
- + **New York** is working through how to support the voluntary market without undermining it



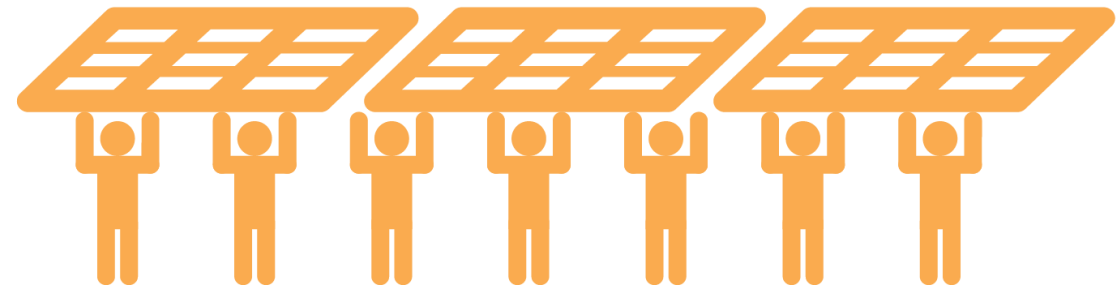
COMMUNITY SOLAR

Communicating the value of “REC-less” Solar

How is the value of community solar conveyed to customers when they are not getting RECs?

Examples of inaccurate marketing:

- + “Go solar!”
- + “Create a community of solar energy users.”
- + “Bringing solar energy to Minnesota businesses and homes.”
- + “Choose community solar for your home.”



CONCLUSION

Consequences of Double Claims

- + Decrease renewable energy demand
- + Threatens the integrity of two complementary markets
- + Consumer protection issues
- + Violation of the law (FTC, state laws)
- + Contractual risk
- + Reputational risk



Thank You

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