How to use this template: Please submit any feedback on the proposed changes in the draft GRP 2.0 in the rows provided below. When you are finished, please include your organization's name in the file name and **send your comments to peggy@theclimateregistry.org**. Comments are **due to The Registry on Friday, February 17th**. Comments submitted to The Registry will be made public through The Registry's website. If you would like your comments to remain private, please request that your comments are not shared publicly in the email you submit to The Registry.

If you have any questions, please contact Peggy Foran at peggy@theclimateregistry.org or (213) 542-0291.

Submitting Organization: Center for Resource Solutions

Public Comment Template for Draft GRP v. 2.0					
Draft GRP v. 2.0 Chapter	**Draft GRP v. 2.0 Section (if applicable)**	**Page Numbers (as listed on bottom of page)**	**Comment Type (Editing/Policy/Tech)**	**Comment**	**Proposed Action**
N/A	N/A	N/A	General Comment	CRS is a nonprofit organization that creates policy and market solutions to advance sustainable energy and mitigate climate change. CRS administers the Green-e® suite of programs, which are independent certification and verification consumer protection programs for voluntary renewable energy and carbon offsets sold in the voluntary market. CRS respectfully offers these comments on the Climate Registry's General Reporting Protocol (GRP) Version 2.0. We are pleased to have the opportunity to contribute to the development of this very important and comprehensive greenhouse gas (GHG) accounting and reporting protocol.	N/A
14, 17	14.2, 17.2	102, 134	Policy/Tech	Section 14.2 treats Renewable Energy Certificate (REC) purchases differently from purchases of bundled renewable electricity. In the proposed GRP, bundled renewable electricity purchases will likely be treated as zero emissions in the total emissions figure, whereas REC purchases are only reflected in an adjusted inventory summary. REC purchases and bundled renewable electricity purchases both convey use of green power and the responsibility for the direct emissions from renewable electricity generation, and consequently should be treated the same. RECs signify the sole and full claim that renewable energy was put onto the grid on behalf of the final purchaser who uses the REC. By purchasing an unbundled REC and pairing it with a commensurate amount of conventional electricity, the buyer takes ownership of the same zero emissions commodity as purchasing bundled renewable electricity. Both commodities are the result of renewable energy generation, which produces few or no direct GHG emissions. From a carbon perspective, there is absolutely no difference between the two commodities. As such, both scenarios should entitle the purchaser to claim few or zero emissions in their Scope 2 emissions and not have the reporting in an adjusted inventory summary, which is meant for offsets. RECs are a commodity that has few or zero direct emissions when paired with conventional power, and as such should not be treated as an offset. Furthermore, it is a common and accepted practice for many utility green-pricing and competitive electricity programs to pair RECs with nonrenewable system electricity and sell it to their customers. Even when utility programs do purchase bundled renewable electricity (RECs and energy together) from renewable generators, that energy is not simultaneously used by the utility's renewable	RECs and bundled renewable electricity purchases should be treated the same within a GHG registry. REC purchases should be reflected in the total emissions figure as opposed to in an adjusted figure.

14	14.2	103-104	Policy/Tech	The emission rate and avoided emissions associated with renewable energy generation are both important attributes included in a REC, and reporting and accounting of each reveals important information about the purchase which may be of interest to voluntary GHG reporting systems. Both attributes are also bundled with the instrument and are not separable. However, for accurate Scope 2 reporting, the emission rate approach is preferable. The attributes of renewable energy that are included in the REC can be divided into two categories, the primary attributes and the secondary attributes. The primary attributes include the identifying characteristics of the electricity generation, such as the energy source, the project location, and the direct emissions of generation (which are zero for most renewable energy technologies). The secondary attributes, also known as the derived attributes, include the emissions from fossil fuel facilities that are displaced by the renewable generation. When accounting for RECs in GHG registries, RECs should be matched with an entity's Scope 2 indirect emissions on a per-unit basis. Both the REC and the electricity used by the entity originate from the same activity (electricity generation) and are measured in the same unit (MWh). By pairing a REC with a commensurate amount of undifferentiated electricity, a claim of zero-emission electricity can be made and the Member can record zero Scope 2 emissions based on the primary emissions attributes of their purchase. While RECs also carry an avoided emissions value, this is a secondary attribute that does not need to be recorded in a Scope 2 inventory, but could be reported as supplemental information.	The emission rate approach calculates emissions based on the primary attributes of renewable energy generation, whereas the avoided emissions approach uses the secondary attributes. Therefore, only the emission rate approach should be used to calculate the emissions associated with the consumption of renewable electricity or the purchase of RECs.

14	14.2	103	Policy/Tech	The proposed eligibility requirements for RECs currently include a suitable list of general project types. However, the list is too broad and ignores some of the finer details regarding these project types. By not stipulating the specific eligibility details of these projects, the GRP will allow RECs from projects with harmful environmental side effects, or less GHG emissions reductions than reported.	Certain sections of the Registry-recognized RECs project types should be adjusted to reflect the complexities of the following project types: • The GRP should not accept RECs from woody waste biomass projects where the woody waste as been chemically treated; • Biomass resources should specifically not include wood that has been coated with paints, plastics, or formica; wood that has been treated for preservation with materials containing halogens, chlorine or halide compounds like chromated copper arsenate-treated materials, or arsenic, and railroad ties; • For renewable energy from biogenic methane capture and destruction projects (such as a dairy burning biogas produced by animal waste), if the project is receiving carbon offsets for the destruction of methane, it should be ensured that the calculation of carbon offset quantity does not include the generation of renewable electricity; and • To maintain the environmental integrity of the project, criteria for renewable energy from municipal solid waste projects should mirror that of the California Energy Commission's Renewable Portfolio Standard Eligibility Guidebook, found at http://www.energy.ca.gov/2010publications/CEC-300-2010-007/CEC-300-2010-007-CMF.PDF (p. 28-29).

14	14.2	103	Policy	The Registry's proposed eligibility requirements are not sufficient to prevent the double counting of RECs. While the GRP states that RECs used for compliance in a regulatory program (such as an RPS) cannot be applied to a GHG inventory as a reduction tool, there are no instructions on how to check for this. This language also does not preclude other forms of double counting. Double counting can occur when any two parties claim the same REC. This is not limited to RECs used for legal mandates, but also when two different Climate Registry Members claim the same REC. The GRP needs to include language to prevent all forms of double use and double counting of RECs.	The GRP should require that RECs are not double counted, and that a Member's claimed MWh of renewable energy generation is not claimed by anyone else. The Registry-recognized RECs section should add a requirement that either the RECs used for the program are subject to third party verification with a chain of custody audit, or at the very least properly retired in an electronic tracking system along with a retirement report from the tracking system to be eligible. Green-e Energy verification ensures that certified RECs were not used for a legal mandate, or claimed by any other parties in both compliance and voluntary markets. The program requires generators that sell off their RECs to not make any claims that the underlying electricity sold was renewable or had renewable attributes. Green-e Energy also requires that when a utility is involved in a REC transaction, either as a generator of renewable electricity or a purchaser of the commodity electricity from which the RECs have been derived, the local utility commissions in the states where the electricity was generated and where the electricity is sold must be notified of the transactions. Claimed RECs cannot be used to calculate another entity's product or portfolio mix for the purposes of marketing or disclosure.
14	14.2	102	Editing/Policy	The current definition of Renewable Energy Certificate (REC) in the GRP is not inclusive of all of the attributes that RECs embody in the voluntary market. The definition is inconsistent with the definition used by the EPA. The Registry's current proposed definition states that RECs "represent the environmental benefits of renewable energy unbundled from the actual flow of electrons." While this is correct, it is limited in scope. RECs are commonly accepted as containing all of the non-power attributes of renewable energy generation, including social attributes (other than those attributes legally counted by a mandate, such as SOx being counted toward a national cap program).	CRS recommends that the definition be amended to reflect the U.S. EPA's definition, which states that a REC "represents the property rights to the environmental, social and other nonpower qualities of renewable electricity generation." http://www.epa.gov/greenpower/gpmarket/rec.htm

14	14.2	103	Policy	The section on Registry-recognized RECs lists acceptable REC certification programs, including Green-e Energy, EcoLogo, and "other equivalent programs or RECs meeting equivalent standards." There are currently no other equivalent programs to Green-e Energy, and the ambiguous language as written could allow RECs from programs without strict criteria. If other programs are going to be allowed as Registry-recognized REC certification programs, the Climate Registry should either stipulate the specific assurances and activities of an acceptable program or evaluate future programs as they arise.	The third bullet point under acceptable REC certification programs should read as follows: *Other equivalent programs or RECs meeting equivalent standards can be added to this list after evaluation by the Climate Registry staff.* For the evaluation of future programs or RECs, equivalence must exist for major Green-e Energy program criteria: 1) resource and facility eligibility as described in the program's National Standard, 2) independent, third-party verification that those standards are being met by the green power supplier over time, and 3) documentation demonstrating unique ownership of all renewable energy attributes and no double-counting or double-claiming.
17	17.2	135	Policy	The offset criteria listed in Section 17.2 provide a sound list of recognized offset programs. However, Green-e Climate is absent from this list. Green-e Climate is the only certification and consumer protection program for retail carbon offsets. Green-e Climate allows only the project standards listed in Section 17.2 for project certification (Green-e Climate Endorsed Programs), yet provides an extra layer of protection against double counting by requiring offset providers to submit to an annual verification process to ensure that no offsets are double sold. As such, it is the only certification to cover the entire chain of custody for retail offsets. Green-e Climate also sets customer disclosure requirements to ensure offsets are as advertised.	Green-e Climate should be added to the list of recognized offset programs in Section 17.2 or alternatively, the Registry should differentiate between programs that provide project-level assurances, which are sufficient for purchases directly from the project, and Green-e Climate, the only program to provide both project- and consumer-level assurances for purchases from carbon retailers.