CRS center for resource solutions

September 14, 2011

U.S. Green Building Council (USGBC)
2101 L St. NW, Suite 500
Washington D.C. 20037

To Whom It May Concern:

Center for Resource Solutions (CRS) appreciates the opportunity to comment on *LEED 2012 Rating System Drafts*.

Background on CRS and Green-e®

CRS is a 501(c)(3) non-profit organization that creates policy and market solutions to advance sustainable energy and mitigate climate change. Our leadership through collaboration and environmental innovation builds policies and consumer-protection mechanisms in renewable energy, greenhouse gas (GHG) reductions, and energy efficiency that foster healthy and sustained growth in national and international markets. CRS has broad expertise in renewable energy and carbon policy and accounting.

CRS administers the Green-e programs. Green-e Energy is the nation's leading independent consumer protection program providing certification and verification for renewable electricity and renewable energy certificates (RECs). Green-e Climate is a certification program that sets consumer protection and environmental-integrity standards for carbon offsets sold in the voluntary market. Green-e Marketplace recognizes companies that make meaningful commitments to use renewable energy by allowing them to display the Green-e logo when they have purchased a qualifying amount of renewable energy and passed the program's verification standards.

Stakeholder-driven standards supported by rigorous verification audits are a cornerstone of Green-e and enable CRS to provide independent third-party certification of environmental commodity transactions. The Green-e environmental and consumer standards are overseen by an independent governance board of industry experts, including representatives from environmental nonprofits, consumer advocates, and purchasers. Our standards have been developed and are periodically revised through an open stakeholder process. Green-e program documents, including the standards, contract templates, and the annual verification report, are available at www.green-e.org.

Comments on Neighborhood Development (ND) Rating System

GIB Credit: On-site renewable Energy Sources

CRS suggests that the following changes be made to language under the subheading "ND Plan, ND:"

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Incorporate on-site nonpolluting renewable energy generation, such as solar, wind, geothermal, small-scale or micro hydroelectric, and/or biomass, with average annual production ~~capacity~~ of at least 5% of the project's annual electrical and thermal energy ~~cost~~ use (exclusive of *existing* buildings), as established through an accepted building energy performance simulation tool.

In all cases, the Renewable Energy Certificates (RECs) and all emissions avoidance claims must be retained by the project owner and not sold; without REC ownership, the project owner cannot earn this Credit or claim to be using renewable energy.

Points are awarded as listed below:

Percentage of annual electrical and thermal energy use ~~cost~~	Points
5%	1
12.5%	2
20%	3

Please find our reasoning and explanation for these suggested changes in the Attachment: Explanation of Suggested Changes.

Thank you again for the opportunity to comment. Please contact us for any clarification on these comments or with any questions.

Sincerely,

Jennifer Martin
Executive Director

Attachment: Explanation of Suggested Changes

Line 1-4

Since renewable energy systems can produce energy that is more expensive than natural gas or grid electricity, calculating the benefit in terms of cost only can be misleading. The suggested changes reflect that renewable energy production should be measured in energy output, rather than cost, which can then be directly and meaningfully compared to building energy consumption.

Line 5-7

This sentence clarifies that retention of the renewable attributes is necessary in order to claim renewable energy use.

Line 9

The suggested change from "energy cost" to "energy use" in the table reflects the change made to lines 1-4.