



CRS

center for  
resource  
solutions

January 4, 2016

Sustainability Accounting Standards Board (SASB)  
75 Broadway, Suite 202  
San Francisco, CA 94111

**Re: Comments of Center for Resource Solutions (CRS) on Public Exposure Draft Standards-Infrastructure**

To Whom It May Concern:

CRS appreciates this opportunity to comment on the October 2015 Exposure Draft Standards for Public Comment for Infrastructure sectors, including Electric Utilities, Gas Utilities, Water Utilities, Waste Management, Engineering Construction Services, Home Builders, Real Estate Owners, Developers & Investment Trusts, and Real Estate Services. Our comments below are organized by Industry Standard.

**Background on CRS**

CRS is a 501(c)(3) nonprofit organization that creates policy and market solutions to advance sustainable energy. Since 1997, CRS has been instrumental in the development of landmark state, regional and national renewable energy and climate policies. CRS also administers the Green-e® programs. Green-e Energy is North America's leading independent consumer protection program providing certification and verification for renewable electricity and renewable energy certificates (RECs) in the U.S. voluntary market. Green-e Climate is a global retail standard for carbon offsets sold in the voluntary carbon market. Green-e Marketplace recognizes and verifies the claims of companies that use certified renewable energy and carbon offsets to reduce their impact. 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 in voluntary markets. 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](http://www.green-e.org).

**Comments**

Electric Utilities

- Reporting Format, Activity Metrics and Normalization, Pg.7, IF0101-C
  - Comment: Regarding the activity metric for “Total electricity generated, percentage by major energy source, percentage in regulated markets” and Footnote 10, it is unclear whether this refers to generation by owned generation assets only or generation for total procured power used to supply customers, i.e. delivered electricity. If the latter, renewable energy certificates (RECs) must be owned for all renewable generation delivered.

- Downstream Energy Stewardship, Accounting Metrics, Pg.29-31 and Table 1 on pg.10, IF0101-11 and -12
  - Comment: A new accounting metric should be added for voluntary renewable energy programs and products. Many utilities offer (and in some states are required to provide) voluntary renewable energy programs, often called utility green pricing programs. Participating customers pay a premium on their electric bills to cover the incremental cost of the additional renewable energy. These supplier products can be differentiated on the basis of whether it is a regulated or deregulated market—this can be a green pricing/power option from a regulated utility, or a competitive green power option in deregulated markets. To date, nearly 850 utilities, including investor-owned, municipal utilities, and cooperatives, offer a green pricing option. Qualifying programs can earn Green-e Energy certification. This metric can include disclosure related to number of participants and percent of customers participating, total MWh of RE delivered through the program, proof of REC retirement, and certifications (e.g. Green-e Energy certification).

### Gas Utilities

- Reporting Format, Activity Metrics and Normalization, Pg.6
  - Comment: A new activity metric should be added for percent of gas supply that comes from biogas/renewable sources. This could be useful sustainability information for investors.
- Downstream Emissions Management, Accounting Metrics, Pg.29-31 and Table 1 on pg.9, IF0102-01 through -04
  - Comment: A new accounting metric should be added for (1) voluntary gas offset programs and products and (2) voluntary renewable/green gas programs/products. Many utilities now offer voluntary gas offset programs, in which carbon offsets are matched with gas usage on behalf of customers, and/or green gas programs, in which customers pay a premium to receive a larger percentage of renewable/biogas. The latter green gas programs are less common and require a means by which to deliver (either physically or contractually) biogas to customers. Qualifying gas offset programs (1) can earn Green-e Climate certification. This metric can include disclosure related to number of participants and percent of customers participating, total amount of gas (e.g. therms) covered by the program, proof of contractual delivery (where appropriate), and certifications (e.g. Green-e Climate certification).

### Water Utilities

- Energy Management, Accounting Metrics, pg.11-12, IF0103-01.05, Total energy consumed, percentage grid electricity, percentage renewable
  - Comment: .05 - We would like to express general support for the language in this section, particularly that which emphasizes the importance of REC retention and ownership in all cases for renewable energy usage claims in the United States, as well as references to Green-e certification. Please let us know if we can provide any further support for these requirements.
  - Comment: .05 - Renewable energy can also be purchased from a utility or supplier. Recommend changing language at .05 to: “purchases through a renewable power purchase agreement (PPA) that explicitly includes renewable energy certificates (RECs), purchases through a Green-e Energy Certified utility or supplier program, or for which Green-e Energy Certified RECs are paired with grid electricity.”

- Comment: .05 - In the first bullet, respondents should also indicate whether on-site use was Green-e certified, since on-site use of renewable energy can also be Green-e certified.
- Comment: .05 - In the second bullet, change “retained” to “retained or replaced” since RECs from the project can be arbitrated in these agreements. Respondents should also indicate whether the purchase was Green-e certified, since direct purchases of renewable energy (e.g. PPAs) can also be Green-e certified.
- Comment: .05 - Footnote 15 should be moved to the first bullet.
- Comment: Respondents should disclose whether renewable energy was procured beyond what is delivered as a part of the default utility mix and/or required by law (e.g. through a state RPS), i.e. through voluntary renewable energy procurement. Respondents should also disclose features of the renewable energy, including type of product e.g. through a local utility program, and length of commitment, as well as whether the renewable energy product is Green-e certified.

#### Real Estate Owners, Developers & Investment Trusts

- Energy Management, Accounting Metrics, pg.12-13, IF0402-02.11, Total energy consumed, percentage grid electricity, percentage renewable
  - Comment: .11 - We would like to express general support for the language in this section, particularly that which emphasizes the importance of REC retention and ownership in all cases for renewable energy usage claims in the United States, as well as references to Green-e certification. Please let us know if we can provide any further support for these requirements.
  - Comment: .11 - RE can also be purchased from a utility or supplier. Recommend changing language at .11 to: “purchases through a renewable power purchase agreement (PPA) that explicitly includes renewable energy certificates (RECs), purchases through a Green-e Energy Certified utility or supplier program, or for which Green-e Energy Certified RECs are paired with grid electricity.”
  - Comment: .11 - In the first bullet, respondents should also indicate whether on-site use was Green-e certified, since on-site use of renewable energy can also be Green-e certified.
  - Comment: .11 - In the second bullet, change “retained” to “retained or replaced” since RECs from the project can be arbitrated in these agreements. Respondents should also indicate whether the purchase was Green-e certified, since direct purchases of renewable energy (e.g. PPAs) can also be Green-e certified.
  - Comment: .11 - Footnote 12 should be moved to the first bullet.
  - Comment: Respondents should disclose whether renewable energy was procured beyond what is delivered as a part of the default utility mix and/or required by law (e.g. through a state RPS), i.e. through voluntary renewable energy procurement. Respondents should also disclose features of the renewable energy, including type of product e.g. through a local utility program, and length of commitment, as well as whether the renewable energy product is Green-e certified.

#### Engineering Construction Services, Home Builders, and Real Estate Services

- Comment: There are no Energy Management (or equivalent) metrics included in the following Standards:
  - Engineering Construction Services
  - Home Builders
  - Real Estate Services

These industries also have some potential to utilize renewable forms of energy in production/operations. We recommend including disclosure metrics related to energy management, similar to those included in other standards.

- There are no Greenhouse Gas Management topic (or equivalent) metrics included in the following Standards:
  - Engineering Construction Services
  - Home Builders
  - Real Estate Services

These industries also have some potential to reduce and offset emissions in production/operations. We recommend including disclosure metrics related to emission reduction measures and carbon offset purchases.

Thank you for your consideration of our comments and please contact me with any questions, for more information, to discuss further, or if we can otherwise be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Jones', with a stylized flourish at the end.

Todd Jones  
Senior Manager, Policy and Climate Change Programs