



CRS

center for
resource
solutions

May 16, 2013

Mr. Daniel Kreeger
Association of Climate Change Officers
1900 K Street NW
Washington, DC 20006

RE: Center for Resource Solutions (CRS) comments on Association of Climate Change Officers (ACCO) *Core Competencies for Climate Change Officers and Professionals*

Dear Mr. Kreeger,

Center for Resource Solutions (CRS) appreciates the opportunity to comment on the *Core Competencies for Climate Change Officers and Professionals*. CRS supports ACCO's mission and the intent of the *Core Competencies* to define what it means to be a "climate change professional." We hope this will strengthen the credibility and advance the proliferation of climate-oriented positions and climate-based decision-making within organizations.

Our comments focus on the fifth bullet describing the Environmental and Economic Literacy competency: "Evaluate and validate programs for carbon offsets and renewable energy credits, and related emissions markets."

Background on CRS and Green-e®

CRS is a 501(c)(3) nonprofit 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 markets.

CRS 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). Green-e Climate serves the voluntary carbon market as the first and only certification and consumer protection program for retail carbon offsets. Green-e Marketplace recognizes companies that use certified renewable energy and carbon offsets to reduce their impact by allowing them to display the Green-e logo when they have purchased a qualifying amount of renewable energy and/or offsets 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.

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Comments

First, CRS would like to express its support for including specific references to the markets for carbon offsets and renewable energy in the Core Competencies. We agree that literacy with respect to these markets is an important competency for climate change professionals as they represent two important mechanisms for organizational engagement in climate mitigative action, and they will be critical to meeting climate policy goals.

We feel that this competency could be strengthened with the following revisions and clarifications to the fifth bullet describing the Environmental and Economic Literacy competency: “Evaluate and validate programs for carbon offsets and renewable energy credits, and related emissions markets.”

- We suggest that ACCO divide this bullet such that renewable energy and carbon offsets are broken out separately. The current organization and phrasing suggests that “renewable energy credits” may be categorized within “emissions markets” and as GHG emissions instruments, which they are not. Renewable energy certificates (RECs) are a means to account for, track and claim renewable electricity generation put onto the electricity grid, and while they convey the use of electricity that is lower impact than fossil fuels, RECs are not offsets and are not meant to be used to, for example, offset emissions from a company’s air travel emissions.
- We suggest further that ACCO’s competencies pertaining to renewable energy not be limited to renewable energy certificates and other instruments. Renewable energy is a broader category within which climate professionals may demonstrate many different areas of proficiency, including onsite, power purchase agreements, utility green electricity programs, combined heat and power, etc.
- ACCO is currently using the term “renewable energy credits.” The commonly accepted terminology is “renewable energy certificate,” which refers to a specific instrument used in the US renewable electricity market, or “renewable energy instruments,” which is often used to refer to different mechanisms for renewable energy trading and disclosure, including RECs. We recommend that the term be changed as appropriate to your meaning, or if something other than this is meant, then we recommend specifically defining “renewable energy credits.” A definition for the term “carbon offset” would also be helpful, since this can often have multiple meanings. Definitions of both “carbon offset” and “renewable energy certificate” can be found in Green-e program documents.
- We suggest that ACCO clarify what is meant by “programs” for carbon offsets and renewable energy. For example, a carbon offset program may refer to an offset project or programme of activities, an offset purchasing regimen or product in the voluntary market, an offset regime under a particular piece of climate legislation, a credit issuing body and standard, or other certifications or recognition programs in the market.
- We suggest that ACCO clarify what it means for professionals to “validate” programs for carbon offsets and renewable energy credits. The term “validation” has a specific meaning in offset markets referring to evaluation of offset projects against a project standard. While certain professionals may be expected to validate emissions reduction projects, it is more likely that ACCO means that professionals should be able to establish the validity of different offset and renewable energy options and products as such options and products relate to the professionals’ goals.
- This bullet, like many others in the list, could be revised to be more action-oriented or supplemented with additional action-oriented competencies. Achievement of this competency, as written, does not suggest any mitigative action *per se*. For example, a complementary competency could be, “Develop, implement, and administer, or assist in the development, implementation, and administration, of a renewable energy

procurement program/policy as a part of the organization's climate strategy." In general, to the extent that the Core Competencies are intended to serve as "expectations" for Climate Change Professionals, it may be helpful to articulate, perhaps in a separate document, how the competencies may translate into outcomes that are measurable and achievable within a certain timeframe.

The markets for carbon offsets and renewable energy can be mechanisms for driving meaningful mitigative action at the organizational level so long as these commodities contain key attributes and meet certain quality and eligibility criteria. The stakeholder-driven criteria in the Green-e programs are intended to serve precisely this purpose. We would be happy to help ACCO develop materials or curricula relating to renewable energy and carbon offsets in order to serve this Core Competency and informed mitigative action.

Please do not hesitate to contact us with any questions at 415-561-2100 and thank you for your consideration of our comments.

Sincerely,

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

Todd Jones
Green-e Climate Manager
Center for Resource Solutions