

## **CRS Comments to Draft WindMade Standard**

**Introduction.** We are pleased to have the opportunity to submit comments to the draft standard as part of the WindMade public consultation process. Since its founding in 1997, Center for Resource Solutions (CRS) has supported efforts to grow the markets for renewable energy worldwide in order to increase renewable energy development and adoption, and we hope that our comments to this draft assist you in your goal of increasing business and consumer awareness of the importance of clean energy and the options consumers have in supporting companies that use wind power in their operations. Over ten years ago, CRS established Green-e, the first certification program for clean energy in North America, in order to increase consumer confidence in green-power options, and so we understand what a complicated task you are undertaking with a unified, global standard. We hope our comments can help create a program that reduces confusion in the various markets where WindMade certified products will be offered and promotes new renewable energy development worldwide.

**3.4 Green Credentials.** CRS is pleased to see the inclusion of a definition of “green credentials” in this draft and recognizes the difficulty inherent in coordinating the many programs and options available to consumers worldwide. As written, the current definition and requirements for Green Credentials could benefit from some additional clarification. As RECs and GOs potentially embody property rights to different environmental attributes, it may be useful to state the general purpose of a “green credential” within the context of this standard. This may include, but not be limited to, a tracking mechanism, ownership of an emissions benefits, or incentive for new development. Currently, it is unclear whether, for example, greenhouse gas emissions benefits of a renewable energy purchase will be required to be included in green credentials, such as a GO. Such emissions benefits are often explicitly included with RECs in the North American market.

CRS supports WindMade’s efforts to help spur renewable energy development through a variety of available certification programs. We believe, for the purposes of this standard, it is important to keep a clear distinction between renewable energy and carbon offsets derived from renewable energy projects. While both renewable energy certificates (or other comparable Green Credentials) and carbon offsets can originate from renewable energy projects, they are two separate and distinct commodities, and should not be considered automatically interchangeable. Renewable energy claims are generally considered to include all the environmental and non-power attributes of renewable energy. CRS recommends that if WindMade is endorsing statements that directly or indirectly imply that the company receiving the certification is using wind energy, that ownership of all the non-power attributes of wind energy be included in the renewable energy product purchased/used by the company, and that no other party, be it another voluntary market participant or a participant in a government program, claim the same renewable energy or any of the renewable attributes for another purpose.

**6.5 Public Claims** The Standard could benefit from providing additional information regarding the allowable claims and condoned uses of the label. There is a great deal of guidance in place in the U.S. regarding the types of claims that can be made surrounding renewable energy use. The National Association of Attorneys General’s Environmental Marketing Guidelines and the draft of the U.S. Federal Trade Commission’s (FTC) new Green Guides should be reviewed to ensure that allowable uses of the WindMade label would meet U.S. regulations. CRS also recommends that the WindMade Standard for Companies and Organizations refine the definition of ‘public claims’ to specifically exclude companies from using an organizational claim on a product.

There are different implications for different types of uses of the label, and more clarification is needed on how participants can use the logo and on the allowable claims so that use of WindMade label does not contradict U.S. best practices or mislead consumers.

**7.3.6** To clarify that both the underlying electricity and renewable energy attributes may not qualify towards a compliance market, CRS suggests adding “and green credential” to read “...the generated electricity and green credential can not be counted towards renewable compliance standards such as Renewable Portfolio Standards and similar schemes.”

**Annex II.** CRS is appreciative of WindMade for recognizing its Green-e Energy certification program. In addition to the U.S., CRS requests that Green-e Energy is referenced as available in Canada. In 2010, companies with Green-e Energy certified products sold approximately 660,000 MWh of renewable energy to Canadian customers.

In addition, CRS would like to see language establishing that in countries where approved certification programs exist (i.e. Annex II programs), WindMade reference the approved technology lists cited under these Annex II programs as the preferred option. Many Annex II programs have established eligible technology types over time and through broad stakeholder processes that are appropriate for their country.

**Annex VI.** Under reporting, the standard references a requirement of a unique identification number from the green credential provider. Green-e Energy accepts, but does not necessarily require unique identification numbers for verification. Not all generators have access to tracking systems (either they are not available or there are other barriers to participation). Independent, third party audits of the chain of custody of green credentials, such as carried out by Green-e Energy in such cases, should also be allowed under this standard as a substitute for tracking serial numbers. As referenced, earlier, Green-e would like to see some explicit language that specifies the Annex II programs as automatically meeting the WindMade standard, though certain aspects may deviate from the WindMade definitions in Annex I or Annex VI.