



CRS

center for  
resource  
solutions

[SUBMITTED ELECTRONICALLY TO: [wregiscomment@wecc.biz]

March 27, 2017

**RE: Green-e® Program Staff Comments on Proposed Appendix G addition to the WREGIS Operating Rules**

To whom it may Concern,

Green-e® Program Staff appreciates this opportunity to comment on the January 2017 Proposed Appendix G addition to the WREGIS Operating Rules.

**Background on Green-e®**

Green-e is a program of Center for Resource Solutions (CRS), a 501(c)(3) nonprofit organization that creates policy and market solutions to advance sustainable energy. Green-e Energy is the leading certification program for voluntary renewable electricity products in North America. In 2015, Green-e Energy certified retail sales of 44 million megawatt-hours (MWh), representing over 1% of the total U.S. electricity mix, or enough to power nearly a third of U.S. households for a month. In 2015, there were over 827,000 retail purchasers of Green-e certified renewable energy, including 50,000 businesses. 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. All Green-e program documents are available at [www.green-e.org](http://www.green-e.org).

**Comments on Draft Operating Rules**

1. Green-e encourages additional clarification on the issuance of Electric certificate creation and Thermal certificate creation.

The proposed Appendix G states that “separate batches of certificates are issued for electric and thermal renewable energy and that certificates are created for one or both types if reported data has been reviewed and approved by the Account Holder or WREGIS Administrator. This means that certificate creation of one type is not dependent upon the reporting or approval of the other type”.

Green-e would like to see additional clarification on the circumstances under which both a TREC and REC are issued, and especially clarification on if a TREC and REC may be issued on the same BTU/MMBTU of generation. In order to prevent double counting of renewable generation, Green-e encourages WREGIS administrators to take steps to ensure that full emissions reductions benefits are embodied in each certificate used toward a single end-use claim. If a Thermal certificate and an Electric certificate are created for the same BTU/MMBTU of generation, retirement of both certificates for end use would result in double counting of those emissions reductions benefits.

Green-e would not recommend issuing RECs and TRECs for the same unit of renewable energy. If this is unavoidable Green-e strongly recommends that an equivalent number of TRECs are retired as RECs in cases where a Thermal certificate and an Electric certificate are created for the same BTU/MMBTU of generation and one of those units is retired for end use. In this scenario, Green-e would also encourage a clearly articulated policy from WREGIS Administrators toward WREGIS Account Holders of what actions need to occur in order to prevent double counting.

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

Sincerely,

Michael Leschke  
Green-e Verification Manager and Senior Analyst