



CRS

center for
resource
solutions

April 21, 2017

Michael Breish, Senior Analyst
Energy Resources and Planning Division
Oregon Public Utility Commission (PUC)
201 High St SE Ste 100
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Salem, OR 97308-1088

Re: DOCKET AR 603. Comments of Center for Resource Solutions (CRS) in response to Final Draft Rules for Oregon's Community Solar Program, dated April 5, 2017

Mr. Breish:

CRS appreciates this opportunity to submit comments regarding final draft rules for Oregon's Community Solar Program under Docket AR 603.

Introduction to CRS & Green-e®

CRS is a 501(c)(3) nonprofit organization that creates policy and market solutions to advance sustainable energy. CRS has broad expertise in renewable energy policy design and implementation, electricity product disclosures and consumer protection, and greenhouse gas (GHG) reporting and accounting. CRS administers the Green-e programs. Green-e Energy is the leading certification program for voluntary renewable electricity products in North America. For over 20 years, Green-e staff have worked with independent third-party auditors to annually verify renewable energy purchases in the voluntary market and ensure purchasers receive full environmental benefits and sole ownership of each megawatt-hour (MWh) of renewable energy they purchase. Verification procedures ensure there is no double counting between voluntary and compliance (RPS) markets, and that other renewable energy or carbon policies do not claim any of the environmental benefits of certified renewable energy. In 2015, Green-e Energy certified retail sales of over 44 million MWh, representing over 1.2% of the total U.S. electricity mix. In 2015, there were over 827,000 retail purchasers of Green-e certified renewable energy, including 36,000 businesses.

Comments

1. We support the draft rules under RPS and RECs.

Specifically, we support the intention of the Community Solar Program in Oregon to deliver solar power to owners/subscribers in excess of what is required under the state RPS. We agree that delivery and retirement of the renewable energy certificates (RECs) on behalf of these owners/subscribers is required in order to achieve this end. However, the current language at Number 1 in this section could be edited to reduce redundancy and increase clarity.

2. We recommend that a description of RECs that can be easily understood by owners and subscribers be included in disclosure statements provided per requirements under Consumer Protection.

Specifically, we suggest that the following or similar language be included in required disclosures to owners and subscribers:

“Solar renewable energy certificates (SRECs) are used to track ownership and use of clean energy generation from solar resources. An SREC is created whenever renewable electricity is generated at a solar facility. Whoever owns the SRECs can claim to be using renewable, solar energy. All SRECs associated with generation at the owned/leased community energy project will be owned by the owners/subscribers and cannot be used by regulated electric companies for compliance with state Renewable Portfolio Standard requirements. This means that community energy projects will be producing clean, solar energy in excess of state requirements exclusively on behalf of owners/subscribers.”

3. The PUC may consider requiring or referencing Green-e certification as a part of the Community Solar Program to support and verify conformance with requirements in the Consumer Protection and RPS and RECs sections.

Specifically, Green-e certification provides the following assurances.

- *Oversight of marketing and promotional materials.* Green-e enforces requirements for all marketing of certified renewable energy, including marketing language requirements and restrictions (Sec IV.E1 of the Green-e Energy Code of Conduct¹); REC disclosure language (IV.E2); requirements for advertising through TV, radio, and electronic media (IV.E7), and requirements for information provided on websites (IV.E8).
- *Customer Disclosure Requirements.* Green-e requires the provision of certain disclosures to customers purchasing certified renewable energy, including certain mailings (Sec IV.B of the Green-e Energy Code of Conduct); prospective and historical Product Content Labels (IV.C); and a detailed Price, Terms, and Conditions (IV.D).
- *Requirements for Terms and Conditions.* Green-e enforces requirements for the terms and conditions that must be provided to customers purchasing certified renewable energy (See Sec IV.D of the Green-e Energy Code of Conduct).

In addition, Green-e includes an independent annual verification audit to verify exclusive renewable energy sales and claims. This audit ensures that RECs are exclusively retired on behalf of owners/subscribers and not used for the RPS. The Green-e Energy annual verification audit process is described in Sec. III.D of the Green-e Energy Code of Conduct.

Other states have required Green-e certification for similar programs. For example, in January 2015, the California Public Utilities Commission (CPUC) directed the three largest investor-owned utilities (IOUs) in the state—Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company, which together cover nearly 80% of the state— to offer a Green-e Energy certified 100% renewable energy option to their customers and encouraged them to develop a range of green power options that will allow ratepayers at all income levels to use more renewable energy than

¹ The Green-e Energy Code of Conduct is available online at: <https://www.green-e.org/docs/energy/Green-e%20Energy%20Code%20of%20Conduct.pdf>.

that which is required under the state's Renewable Portfolio Standard.² Each IOU will offer two distinct Green-e certified program models:

- Green Tariff: Customers can sign up to meet up to 100% of their electricity with solar generation purchased from the utility. The customer will see an additional charge on their utility bill that reflects the additional costs of receiving solar generation to meet their electricity use.
- Enhanced Community Renewables (ECR): This program reflects the "Community Solar" model of renewable energy purchasing. Customers sign up to purchase a portion of a local solar project directly from a developer at a level that meets at least 25% and up to 100% of their monthly electricity demand. The customer will pay the developer for the subscribed output, and receive a credit on their utility bill that reflects their enrollment level.

According to the CPUC's order, "[Green-e Energy certification] will benefit customers and the GTST [sic] [Green Tariff Shared Renewables] Program as a whole," and:

"the Green-e Energy National Standard is developed with input from the public, including electricity users, generators, consumer protection groups, environmental policy and advocacy groups, renewable fuel companies, environmental regulatory bodies and others. Green-e Energy certification will provide consumers with assurance that the product meets the Green-e Energy National Standard. Green-e Energy certification will also provide customers with standardized, understandable information on the energy's attributes."³

Questions

1. Are projects required to register in the Western Renewable Energy Generation Information System (WREGIS) and how will RECs be retired?

Thank you very much for the opportunity to comment. We would be happy to supply any other supporting or clarifying information that would be helpful.

Sincerely,



Todd Jones
Senior Manager, Policy and Climate Change Programs

² California Public Utilities Commission (CPUC). Decision 15-01-051. January 29, 2015. *Decision Approving Green Tariff Shared Renewables Program for San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company pursuant to Senate Bill 43*. Available online: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M146/K250/146250314.PDF>.

³ California Public Utilities Commission (CPUC). Decision 15-01-051 January 29, 2015. Section 5.4, pg. 90.