



November 8, 2019

Public Utilities Commission of the State of Colorado  
1560 Broadway, No. 250  
Denver, CO 80202

**Proceeding 19A-0369E: Comments of Center for Resource Solutions on Public Service Company of Colorado's Renewable Energy Compliance Plan**

Center for Resource Solutions (CRS) appreciates this opportunity to submit comments in this proceeding. Our comments are limited to Public Service Company of Colorado's (Xcel Energy, Inc.'s) WindSource® product offering.

**Background on CRS and 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 program design and implementation, and provides technical guidance to policymakers and regulators at different levels on matters related to policy design, renewable energy accounting, tracking and verification, market interactions, and disclosures and consumer protection. CRS also administers the Green-e® programs. Green-e® is the leading independent certification for voluntary renewable electricity products in North America. For over 20 years, the Green-e® program's verification procedures have ensured that voluntary purchasers of renewable electricity products receive clear and accurate information from their providers and the full environmental benefits and sole ownership of each megawatt-hour (MWh) purchased. CRS, with oversight by the independent Green-e® Governance Board, maintains a stakeholder-driven standard development process. In 2018, Green-e® certified retail sales of over 62 million MWh, serving over 1.2 million retail purchasers of Green-e® certified renewable energy, including 61,000 businesses.<sup>1</sup>

**Comments on WindSource®**

Xcel Energy has stated in its 2020-21 Renewable Energy Plan that, "The WindSource® program will continue to maintain its certification through the Center for Resource Solution's Green-e® Energy program."<sup>2</sup> WindSource® for Colorado has been Green-e® certified since 2005 and is currently in good standing. One requirement of the Green-e® program is that facilities used to supply certified products

---

<sup>1</sup> See the 2019 (2018 Data) Green-e Verification Report here for more information: <https://resource-solutions.org/g2019/>.

<sup>2</sup> 19A-XXXXE Attachment JW1-1, Pg. 51 of the file, pg. 50 of the plan.

[https://www.dora.state.co.us/pls/efi/efi.show\\_document?p\\_dms\\_document\\_id=908378&p\\_session\\_id=](https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=908378&p_session_id=)

must not be more than 15 years old.<sup>3</sup> If the company plans to use generation from facilities that are or become more than 15 years old during the 2020-21 time period to supply WindSource®, they will not meet Green-e® program eligibility criteria and either WindSource® cannot be Green-e® Certified or alternative supply from facilities built within the last 15 years must be procured.

The use of “new”<sup>4</sup> renewable resources for voluntary renewable energy products is a common principle within the voluntary market. It has been incorporated by a number of other standards and recognition programs as well. For example, if Xcel Energy uses resources that are more than 15 years old for WindSource®, customers could not receive credit for purchasing renewable energy under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program<sup>5</sup> or qualify for participation in the U.S. Environmental Protection Agency's (EPA's) Green Power Partnership (GPP) program<sup>6</sup>, among others.

The intent of this principle and Green-e® program requirement is to enable voluntary customers to drive the development of renewable energy and expand U.S. renewable energy markets. It has been upheld and enforced through the Green-e® program since its inception more than 20 years ago. After 15 years of supplying the voluntary market, generation from older resources should be reallocated to the general customer base and replaced in voluntary products with new generation in order to drive the market forward.

We and our stakeholders of course recognize the importance of long-term purchasing for renewable energy development, and the requirement for new renewables in the voluntary market has not been in conflict with that. Voluntary market standards and recognition programs will often allow projects supplying long-term contracts or owned projects to remain in the program past the 15-year age limit through the length of the original contract term or up to a maximum age. But this exception is usually restricted to contracts or offerings where the buyer or group of customers or buyers have made a commitment to purchase from the facilities for the length of the contract term. It does not usually apply to supply that is used for traditional utility green pricing products where residential customers can come in and out of the program, e.g. WindSource®.

If Xcel Energy intends to use facilities to supply WindSource® that are more than 15 years old, it cannot maintain Green-e® certification, and neither will it meet voluntary market best practice. We recommend that Xcel Energy continue to provide generation from new renewable resources to

---

<sup>3</sup> Green-e Renewable Energy Standard for Canada and the United States v3.3, Section II.E, pg.7-8. <https://www.green-e.org/docs/energy/Green-e%20Standard%20v3.3%20US.pdf>.

<sup>4</sup> “New” is consistently defined as 15 years old or newer.

<sup>5</sup> USGBC LEED BD+C v4.1 EA Credit: Renewable Energy, pg. 83-4. <https://build.usgbc.org/bdc41>.

<sup>6</sup> US EPA Green Power Partnership. Green Power Partnership Requirements New Renewables Requirement. <https://www.epa.gov/greenpower/green-power-partnership-new-renewable-requirements>

WindSource® customers along with the other important consumer protection benefits that come with Green-e® certification, which have been articulated by Xcel Energy and others throughout this and previous filings.

Thank you again for the opportunity to provide comments on this proposal. Please let me know if we can provide any additional support.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_

Todd Jones

Director, Policy