



November 8, 2019

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

Proceeding 19AL-0268E: Comments of Center for Resource Solutions on Public Service Company of Colorado's Proposed Certified Renewable Percentage Offering

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) proposed Certified Renewable Percentage (CRP) 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.¹

Comments on Proposed CRP Offering in Colorado

First, since it is meant to represent the delivered renewable energy that customers can claim to be receiving from the company, the CRP for a given year should represent renewable energy certificates (RECs) that are actually retired for that year's sales. The sample 2018 calculations (in Attachment JW1-3)

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

appear to show a CRP that is based on current-year RECs as a percent of current-year sales while those RECs are in fact banked and the RECs actually retired that year for the Colorado Renewable Energy Standard (RES) are of a different amount and vintage.

Second, the CRP for a given year should include the RES percentage. We understand this to be the case. But again, the 2018 sample calculations are somewhat confusing because they appear to show that the CRP includes non-RPS generation for which RECs are not retired and not the RPS portion. In fact, in this example we believe customers can claim 20% renewable energy in 2018 based on REC retirements for RES compliance and no other REC retirements, whereas Xcel Energy reports 18.2% based on RECs that are not retired for that year's sales. We understand that the CRP program is intended to provide and disclose the delivery of renewable energy beyond the RES as a part of the company's default offering. The CRP should therefore include at least the RES percentage, based on the RECs retired for that portion, plus any RECs that are retired for that year's sales that are not included in voluntary products (e.g. WindSource®) or otherwise dedicated to specific customers.

Third, REC vintages for the RES portion of CRP should comply with RES vintage requirements and REC vintages for the non-RPS portion and should align with voluntary market best practice, e.g. the Green-e® certification program enforces a 21-month vintage window around the year of sale that includes the current year, the previous two quarters, and following quarter.

Fourth, we recommend that Xcel Energy provide a clear and prominent explanation of any differences between the CRP and other disclosure that Xcel Energy provides to customers about total system fuel mix or renewable energy generated (of which some may not be delivered to customers or for which RECs may be sold). RECs determine delivery, sale, or use of renewable energy by retail customers, since there is no physical delivery of renewable or other specified power on a shared grid. Xcel Energy rightly proposes to retire RECs for the CRP program to avoid double counting. But if Xcel Energy is also reporting to customers the renewable generation on its system or renewable generation as a percentage of the power that is physically serving customer load, while this may be reported without considering REC ownership or sales, it should be made clear that this is not necessarily what is being purchased or can be claimed by customers (e.g. if RECs are sold off). It may be misleading to characterize this as the "fundamental energy mix serving customers"² without additional explanation. The disclosure language proposed by Mr. Ihle in his October 11, 2019 Rebuttal Testimony³ may not be sufficient for consumer understanding.

² Paraphrasing from pg. 28 of Rebuttal Testimony and Attachments of Jack W. Ihle on behalf of Public Service Company of Colorado, October 11, 2019. Colorado Public Utilities Commission. Proceeding No. 19AL-0268E. https://www.dora.state.co.us/pls/efi/EFI.Show_Filing?p_session_id=&p_fil=G_759556.

³ *Ibid*, see pg. 29.

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