



CRS

center for
resource
solutions

California Energy Commission

DOCKETED

14-RPS-01

TN 73815

OCT 09 2014

October 6, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-RPS-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments of Center for Resource Solutions (CRS) regarding October 7, 2014 Proposed Process to Allow Creation of Retroactive Renewable Energy Certificates and Extend the Deadline for the Interim Tracking System for the Renewables Portfolio Standard

Center for Resource Solutions (CRS) appreciates the opportunity to provide comments on the proposed process for retroactive renewable energy certificate (REC) creation. CRS is a nonprofit organization that creates policy and market solutions to advance sustainable energy and mitigate climate change.

CRS administers Green-e® Energy, North America's leading independent certification and consumer protection program for renewable energy sold in the voluntary market. Green-e Energy certifies and verifies roughly three quarters of the U.S. voluntary renewable energy market and an even higher proportion of U.S. voluntary REC sales. CRS's role in this market is to protect the voluntary consumer against double counting and false claims, and ensure the purchaser of renewable energy that they are receiving all of the attributes of renewable energy generation that they were promised.

We are writing in support of the California Energy Commission's proposed process to create retroactive RECs as written, including the requirement for auditors to verify that MWh have not already been claimed and counted. Having this thorough process in place helps to ensure that double counting does not occur.

Although the majority (55%) of RECs verified by Green-e Energy are tracked in an electronic tracking system like WREGIS, Green-e Energy does not currently require the use of tracking systems. To maintain integrity in the marketplace CRS is strongly in support of the proposed requirement for auditors to obtain a letter from state and voluntary program administrators for which the retroactive RECs are eligible. In addition to Green-e Energy's voluntary program, not all state programs require the use of tracking systems, and some state renewable energy portfolios (RPSs) do not have geographic restrictions on RECs. It's important to check with these programs, especially for RECs that have already been claimed and verified outside of tracking systems. This process will help to avoid potential double counting. It should be noted that there may be costs associated with auditor information requests to state and voluntary programs, and that CRS may need to charge a fee to cover our costs as a nonprofit organization to provide the requested research and/or documents.

Please feel to contact us with any questions or feedback about these comments, or if we can otherwise be of assistance. Thank you again for staff's work on this proposal and the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachael Terada". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rachael Terada
Senior Project Manager