

SOLAR ATTRIBUTES SHOULD NOT BE COUNTED TWICE

(But Don't Take our Word for It: Following are just some of the organizations globally that support this view)

You Are Not Solar if you Sell the RECs



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What environmental claims can be made for an on-site renewable energy project if the project owner sells the RECs?

Companies that install and own on-site renewable power systems can claim the use of green power from their projects. However, ***companies that choose to sell the RECs*** from their system to improve project economics ***give up the right to claim they are buying the green power from the system, even though it is located at their facility.***

<http://www.wri.org/publication/bottom-line-renewable-energy-certificates>



The purpose of the AIB is to develop, use and promote a standardised system: the European Energy Certificate System - "EECS"

Moreover, certification enables a value to be accorded to specific types of product; and ***for this value to be traded separate to the product itself.***

EECS Rules: http://www.aib-net.org/portal/page/portal/AIB_HOME/EECS/EECS_Rules/EECS%20Rules%20Release%207%20v7.pdf



Making Environmental Claims

1. **Ensure your contractual right to make claims.** You should ensure that your green power purchase contractually conveys the full rights to the environmental benefits of the generation source. ***Your organization must retain these rights in order to make an environmental claim.***
2. **Ensure your purchase does not count towards a mandate.** Buyers of unbundled renewable energy certificates (RECs) or bundled green power products should ensure that their supplier is not also applying the underlying attributes and environmental benefits to a mandate (e.g., a state renewable energy portfolio standard [RPS]). Such a situation would constitute a double claim between you and your supplier.

<http://www.epa.gov/greenpower/buygp/claims.htm>





RECs are the sole means to claim usage of grid-connected renewable electricity in the United States... Renewable electricity generation and

use are tracked through RECs, and so [only] by matching

RECs with your electricity service you are using renewable electricity.

http://www.green-e.org/learn_glossary.shtml



The Climate Registry is governed by its Board of Directors, which represents U.S. and Mexican states, Canadian provinces and territories and Native Sovereign Nations.

Many Members in the EPS [Electric Power Sector] purchase or sell “green power” certificates such as Renewable Energy Certificates (RECs), Tradable Renewable Credits (TRCs), Tradable Renewable Energy Certificates (TRECs), and other certificates linked to special types of power generation (collectively referred to in this protocol as power certificates). Power certificates provide proof that a given unit of electricity has been generated from a qualified resource connected to the grid (e.g. in the case of RECs a qualified renewable resource). These certificates are often “unbundled” and sold separately from the underlying physical electricity associated with the generation source, **and in this way they provide a mechanism for certificate buyers to incentivize the generation of specific types of power.**

Vermont Statutes definition of “Tradeable renewable energy credits”:

The party claiming ownership of the tradeable renewable energy credits **has acquired the exclusive**

legal ownership of all, and not less than all, the environmental attributes associated with that unit of energy.



-- 30 VSA 8002(22)(B)

