

September 1, 2010

Comments from the Renewable Energy Markets Association on Federal Guidance on GHG Emissions and the Use of RECs

The Renewable Energy Markets Association (REMA) appreciates the opportunity to offer the following comments regarding the Council on Environmental Quality's (CEQ) released *Draft Guidance for Federal Greenhouse Gas Reporting and Accounting*. REMA commends the Administration for its leadership on recording, reporting, and reducing greenhouse gas emissions and supporting the clean energy economy. The Federal Government can and should be an early adopter of these important best practices for realizing emissions reductions.

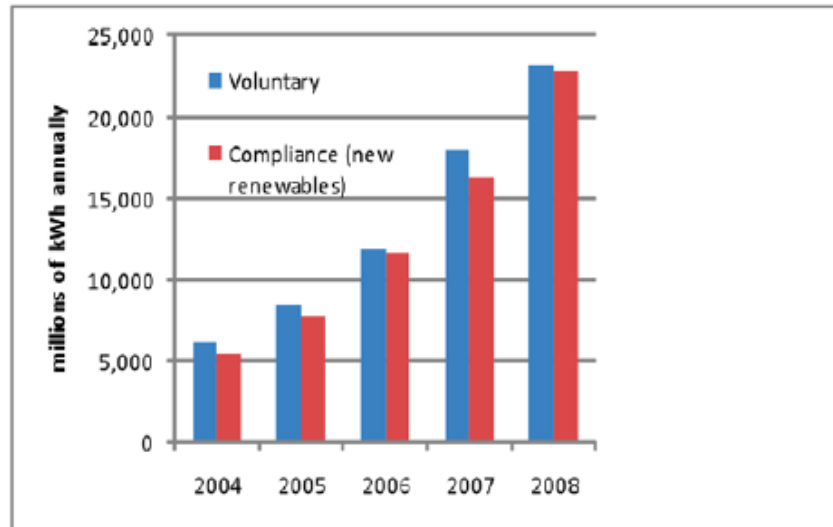
REMA represents the collective interests of both for-profit and nonprofit organizations that sell or promote renewable energy products through voluntary markets, including renewable electricity and renewable energy certificates (RECs), to individuals, companies and institutions throughout North America.

We would like to submit for consideration general comments focusing on the use of renewable energy and RECs as options for reducing a facility's Scope 2 emissions.

Currently, many businesses, households, government agencies, and other organizations voluntarily purchase "green power"—renewable electricity or renewable energy certificates—or install on-site renewable electricity generation like solar as part of their commitment to reducing their global warming footprint. The market for green power (renewable electricity and RECs sold independently of electricity) is strong and growing. In 2008, U.S. consumers made voluntary purchases of renewable energy totaling about 24.3 million MWh. For market credibility reasons, voluntary demand is served almost exclusively by new renewables, meaning renewable generation that began commercial operation since the beginning of 1997. Further, voluntary purchases of renewable energy have grown at an average annual rate of 41% since 2004.¹ The voluntary market continues to be an important driver of clean energy development across the United States, responsible for millions of dollars in new investment.

¹ Bird, L., C. Kreycik and B. Friedman. *Green Power Marketing in the United States: A Status Report (2008 Data)*. Golden, CO: National Renewable Energy Laboratory, September 2009.

Comparison of voluntary and compliance markets for renewable energy in the U.S., 2004-2008



Source: National Renewable Energy Laboratory, Green Power Markets in the United States: A Status Report (12th Edition). September 2009

Voluntary purchasers of renewable energy are motivated primarily by a desire to reduce their greenhouse gas emissions, and we applaud the CEQ for appropriately including purchases of renewable energy, renewable energy credits, and on-site renewable generation as tools an entity has at its disposal for reducing its Scope 2 emissions. Increasing the utilization of renewable energy is necessary for reducing greenhouse gas emissions. We urge the CEQ not to alter the eligibility of these important sources as it drafts and releases its final guidance.

Retaining the use of RECs is particularly essential because it affords the buyer an additional sourcing option for reducing Scope 2 emissions. Without RECs, facilities that opt against installing onsite renewable generation would be beholden solely to their utility for acquiring green power and achieving Scope 2 reductions. It is useful to note that when utilities deliver green power to customers, they are simply attaching a REC to a given MWh – a process that mirrors consumers who purchase RECs equivalent to the amount of electricity they consume. RECs allow a third option to onsite renewables and local utility green power programs, providing the efficiency of a larger and more fungible system for acquiring renewable energy and its associated emissions benefits.

The Renewable Energy Markets Association appreciates this opportunity to comment. There exists today a vibrant market for individual and corporate customers to voluntarily purchase renewable energy in order to encourage new renewables development and to reduce greenhouse gas emissions. We thank and support the CEQ for recognizing the important role of renewable energy and RECs.



1211 Connecticut Ave NW, Suite 600 • Washington, DC 20036-2701
202-640-6597 tel • 202-223-5537 fax • www.renewablemarketers.org

Respectfully Submitted,

A handwritten signature in black ink that reads "Jay Carlis".

Jay Carlis, REMA President
Vice President, Sales and Marketing
Community Energy, Inc.
jay.carlis@communityenergyinc.com
(610) 230-0378

A handwritten signature in black ink that reads "Kyle Gibeault".

Kyle Gibeault, REMA General Manager
kgibeault@ttcorp.com
(202) 640-6597