

EcoLogo^{CM} Program Criteria Review Certification Discussion Document

CCD-003: Electricity-Renewable Low-Impact
(J) GENERAL CONSIDERATIONS



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1 Instructions

EcoLogo^{CM} is inviting stakeholders to participate in the review of CCD-003: Electricity-Renewable Low-Impact. This standard is being revised to assure that the current requirements continue to define environmental leadership for renewable low-impact electricity.

Currently, both the scope and the criteria statements found in CCD-003 determine what the EcoLogo^{CM} Program considers to be environmental leadership amongst all types of electricity production in North America. During this review, the EcoLogo^{CM} Program will re-examine both the scope and the criteria statements. As such, leadership will continue to be defined by first determining what types of electricity can be considered as “renewable low-impact” (i.e. scope), and second what requirements should be established to assure that facilities which produce these types of electricity are following best environmental practices according to the market (i.e. criteria statements).

Stakeholder contributions play a pivotal role in the EcoLogo^{CM} standards development process.

To begin your participation and register for the review process:

- Send a request to forums@ecologo.org and specify your name (first and last name), indicating your affiliation, and your wish to participate in the CCD-003: Electricity-Renewable Low-Impact.

While the EcoLogo^{CM} Standard Development Forum is the main tool for compiling comments, the EcoLogo^{CM} program will also accept comments by e-mail and fax. These comments may also be posted to the online forum and will be viewable by all registered forum participants involved in the discussion.

This stakeholder consultation period will be open for 52 days beginning Nov 18, 2008. Comments must be received by January 9, 2009.

Your time and input in helping us to establish the most stringent environmental standards are very much appreciated. We will send you a reminder as our closing date for comments approaches.

Sincerely,

EcoLogo^{CM} Program Management
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2 Introduction

The purpose of this section of the Certification Discussion Document (CDD) is to present considerations that are not raised in the other sections of the CDD, and to solicit comments regarding specific issues that here need to be resolved.

The EcoLogo^{CM} Program is designed to support a continuing effort to improve and/or maintain environmental quality by reducing energy and materials consumption and by minimizing significant life cycle environmental impacts. Life cycle review is an ongoing process and as such, EcoLogo^{CM} certification criteria are regularly updated. Products are also re-audited regularly to ensure certified products continue to offer significant environmental benefits.

3 Discussion Points of Unresolved Issues

For each topic presented in this section we ask questions for which stakeholders may provide their answers via the EcoLogo^{CM} Standard Discussion Forum.

3.1 Specific Considerations

3.1.1 General Requirements

Currently, CCD-003 contains general requirements which define environmental leadership for all of the types of renewable low-impact electricity sources (i.e. wind, water, solar, etc.) in sub-sections 3 and 4 of its *General Requirements* and *Product Specific Requirements*.

- 1.Q) Are there new requirements that you think the EcoLogo^{CM} Program should consider that applies for all the types of renewable low-impact energy sources either already in CCD-003 or under consideration as additions during this review (e.g. geothermal and tidal and wave-powered electricity)?

3.1.2 Age of Facilities

3.1.2.1 Harmonizing the Green LeafTM Tradeable Renewable Certificates (TRCs) Program Standard with CCD-003?

As part of this review, the EcoLogo^{CM} Program proposes the inclusion of the current Green LeafTM TRCs Program within CCD-003.

The current *Verification* section of CCD-003 includes a section that states that:

To meet the requirements of this criteria document, marketers of electricity must be able to demonstrate to the satisfaction of the Environmental Choice Program [now known as the EcoLogo^{CM} Program] that the portion of their multi-sourced power product conforming to this

criteria document incorporates a minimum of 50% Type II Electricity and/or Type III Electricity and a maximum of 50% Type I Electricity.

The age types of electricity found in CCD-003 are defined as such:

- “Type I Electricity” means ECP-certified electricity from a generation facility that began operations (e.g. generating electricity) prior to January 01, 1991”
- “Type II Electricity” means ECP-certified electricity from a generation facility that began generating electricity from January 01, 1991 to March 31, 2001 inclusive.
- “Type III Electricity” means ECP-certified electricity from a generation facility that began generating electricity on or after April 01, 2001.

Alternatively, the current Green LeafTM TRCs Program Standard, it is stated that Green LeafTM TRCs must be designated as either:

- “Level A tradeable renewable electricity certificate” means a TRC that is from a facility that began generating electricity on or after April 1, 2001.
- “Level B tradeable renewable electricity certificate” means a TRC that is from a facility that began generating electricity from January 1, 1991 to March 31, 2001 inclusive.

2.Q) Should the EcoLogo^{CM} Program certify electricity products (e.g. TRCs and facilities) of the same age group throughout its revised 2008-2009 CCD version? If not, why not?

3.Q) The EcoLogo^{CM} Program should be certify renewable low-impact electricity products of which age groups and why?

3.1.2.2 New Renewables

The *Green-E National Standard* (2007) commonly used to certify green electricity in the U.S. currently stipulates that:

- Only new renewables are eligible to meet Green-e standards. The term "new" is defined to include any eligible renewable facility beginning operation or repowered after January 1, 1997.
- An eligible new renewable generation facility must meet at least one of some of the following conditions:
 - Placed in operation (generating electricity) on or after January 1, 1997;
 - Repowered on or after January 1, 1997 such that at 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering. In order to be recognized as repowered for the purposes of Green-e Energy, the owner of the facility seeking “repowered” status must satisfactorily complete the Green-e Energy Repowering Worksheet available on www.green-e.org;
 - A separable improvement to or enhancement of an existing operating facility that was first placed in operation prior to January 1, 1997, such that the proposed incremental generation is contractually available for sale and metered separate from the existing generation at the facility;

- *A biomass co-firing facility that meets all requirements for biomass co-firing outlined in section II.B. above and began co-firing non-eligible fuels with eligible biomass as defined in II.A. above on or after January 1, 1997;*
- *A 100 percent switch from a non-eligible fuel to an eligible fuel on or after January 1, 1997;*
- *A separately metered landfill gas resource that was not being used to generate electricity prior to January 1, 1997; and/or*

4.Q) Should the EcoLogo^{CM} Program also only certify new facilities? If so, what should their age be and why? If not, why not?

3.1.3 Duration of Licenses

The duration of EcoLogo^{CM} licenses usually last for an extra 6 months after a licensee has fallen out of compliance with a most up-to-date standard. However, this general rule of thumb is problematic for electricity products for which long term contractual obligations often exist.

5.Q) Once a renewable low-impact facility has been granted EcoLogo^{CM} license, how long should it last and why?

6.Q) If an electricity generating facility that once met the EcoLogo^{CM} standard for low-impact electricity no longer meets the revised version of the criteria yet holds a long-term contract based on it being EcoLogo^{CM} certified, should it remain EcoLogo^{CM} certified for the duration and quantity of production required by contractual obligations? If so, why and how? If not, why not?

3.1.4 White Tags for Negawatts

According to Croston (2008), a negawatt is defined as one MW of electricity conserved for one hour and this type of energy savings could receive white tags as certificates demonstrating the amount of energy saved by an energy conservation project. As well, this author claims that, “while the installation of solar, wind, and other forms of renewable energy have enjoyed a meteoric rise, much of the energy we produce is wasted. By most accounts, the U.S. still wastes a third or more of the electricity it produces, making conserved energy potentially one of our most abundant and clean energy resources.” He believes that the potential for certifying efficiency projects and White Tags is great.

7.Q) Should the EcoLogo^{CM} Program consider including white tags as renewable low-impact electricity products in CCD-003? If so, how and why? If not, why not?

3.1.5 Waste Heat

According to the WorldWatch Institute (2007), out of 500,000 smokestacks in the United States, 47,500 stacks that produce waste heat above 260 degrees Celsius could produce at least 50,000 MW of power. Also, the United States could conceivably continue producing the same amount of energy it does now, with half the fossil fuel, by recycling the waste heat from its factories and electric generating stations.

Currently electricity from waste heat captured from an industrial or commercial process that is fuelled by renewable energy sources can be certified under CCD-003.

- 8.Q) Should waste heat from non renewable energy sources also be considered in CCD-003? If so, why and how? If not, why not?

3.1.6 Impacts of Transmission Lines

The environmental impacts of transmission lines are not currently addressed in CCD-003, nor have they been considered in this review. However, transmission lines can pose significant environmental impacts according to the Ontario Power Authority & SENES Consultants Limited (2005).

- 9.Q) Should the EcoLogo^{CM} differentiate between off-grid and grid-connected renewable low-impact energy projects? If so, how and why? If not, why not?

3.1.7 Social Considerations

Employing a percentage of locals (e.g. staff living within 100 km of the operation site) at any stage in the life cycle of renewable low-impact energy production can reduce environmental impacts due for example to transportation.

- 10.Q) Do you think that CCD-003 should include that a percentage of locals should be employed in renewable low-impact energy projects? If so, what percentage, how and why? If not, why not?

- 11.Q) To determine if staff members are local, should a 100km radius range be used?

3.2 General Considerations

Following the discussion of all the topics presented above:

- 12.Q) Do you think that the issues presented above have addressed all the major concerns regarding the review CCD-003- Electricity - Renewable Low-Impact which are not covered in the other technology-specific CDDs? If not, which issues do you think are missing and why?

4 Reference

Croston, G. (2008). *Getting More for Less: The Growing Role of Negawatts*. Retrieved September 9, 2008, from <http://www.renewableenergyworld.com/rea/news/reinsider/story?id=52329>

Green-E. (2007). *National Standard Version 1.5*. Retrieved July 4, 2008, from http://www.green-e.org/docs/energy/Appendix%20D_Green-e%20Energy%20National%20Standard.pdf

Ontario Power Authority & SENES Consultants Limited. (2005). *METHODS TO ASSESS THE IMPACTS ON THE NATURAL ENVIRONMENT OF GENERATION OPTIONS*. Retrieved September 3, 2008, from <http://www.energy.gov.on.ca/opareport/Part%204%20-%20Consulting%20Reports/Part%204.4%20SENES%20Final%20Report%20to%20OPA.pdf>

Worldwatch Institute. (2007). *Clean Energy's Best-Kept Secret: Waste Heat Recovery*. Retrieved November 5, 2008, from <http://www.worldwatch.org/node/5499>.