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1. Introduction

Unbundled electricity products like Tradeable Renewable Energy Certificates (TRCs), which are also commonly known as Renewable Energy Certificates (RECs) or Green Tags, are not currently addressed in the current active EcoLogo™ standard for renewable low-impact electricity (CCD-003). This standard currently only addresses bundled renewable low-impact electricity products. However, TerraChoice Environmental Marketing Inc., the company which manages the EcoLogo™ Program, currently certifies TRCs as part of the separate *Green Leaf™ Tradeable Renewable Electricity Certificates (GL TRCs) Program Standard*.

Following preliminary research and a discussion with stakeholders, it was clear that stakeholders want TRCs to be addressed within CCD-003. Therefore, the EcoLogo™ Program integrated many sections of the *GL TRCs Program Standard* within the first draft of CCD-003. This will clarify the electricity products that can be certified by TerraChoice. Also, making EcoLogo™ TRCs available to the market, is especially crucial since the RECs market represents the bulk of the renewable energy market sales when compared to bundled electricity currently addressed within CCD-003. The RECs market has grown by over 100% in 2007.

2. New Criteria Statements to the Current Active Standard

Following preliminary research and a discussion with stakeholders, the EcoLogo™ Program will address the following environmental impact categories, and related stressors, by proposing to add new criteria statements to the current active standard. Each proposed criteria statement is followed by a rationale explaining why we are proposing the addition to the standard. Only those topics that were discussed with stakeholder will be presented below.

2.1. RECs instead of TRCs

[Addition]:

“Renewable Energy Certificate” or **“REC”** means an authorized electronic or paper representation of the environmental attributes associated with the generation of defined amounts of renewable low-impact electricity from an **EcoLogo™** certified electricity generation facility. **RECs** allow the environmental, social, and economic attributes of the electricity to be separated from the electricity itself, and passed on or sold as a separate product. For the purposes of this standard, a **REC** only represents the environmental attributes associated with the offsetting of null electricity from the grid.

Environmental Attributes

25. **RECs** must have attached all of the relevant environmental attributes associated with the generation of the renewable low-impact electricity to the full extent possible based on current regulatory and legal requirements. In other words, the **RECs** must represent all of the environmental attributes associated with the offsetting of the same quantity of null electricity from the grid.

26. Environmental attributes must be associated on a unit-to-unit basis; in other words, one **REC** unit must have the associated environmental attributes of **one megawatt-hour** of electricity.

32. **EcoLogo™ RECs** must be sold in blocks of at least **0.1 megawatt-hours** per month. This minimum quantity represents approximately 17% of the electricity used by an average household. **EcoLogo™ RECs** may be sold in blocks larger than this minimum.

47. **EcoLogo™ RECs** must be accompanied by product disclosure information that includes, as a minimum, the following information:

(c) the quantity of renewable low-impact electricity that generated the **EcoLogo™ RECs** (i.e. the number of **megawatt-hours**);

41. **RECs** may be sold on a one-time basis, as opposed to an ongoing contractual basis, so long as the block size is a minimum of **0.1 megawatt-hours**. These RECs sold on a one-time basis include *inter alia* general usage, trade shows, conferences, receptions, and other events.

Rationale:

Following preliminary research and a discussion with stakeholders, it became apparent that “RECs” associated to 1 MWh of electricity is the most common terminology in the market for the environmental attributes associated with renewable low-impact electricity. As a stakeholder mentioned, by adopting this common terminology, the EcoLogo™ Program will help provide more clarity to the REC market. Furthermore, associating a REC to 1 MWh instead of 100 KWh will still allow RECs from being sold in smaller quantities as REC fractions. Therefore, this change to the statement found in the *Green Leaf™ TRCs Standard* would pose no significant consequence to RECs sellers and buyers of smaller quantities of electricity.

2.2. Duration of RECs

[Addition]:

40. **RECs** may include only the environmental attributes that are generated in the same calendar year in which the **RECs** are sold, the first **3** months of the following calendar year, and/or the last six months of the previous calendar year.

Rationale:

Stakeholders agreed with the intent of the current above statement taken almost verbatim from the *GL TRCs Program Standard*. For instance, this statement provides consumers with the satisfaction that their product was produced or will be produced soon. Also, it was stated that harmonizing with the Green-e Energy Standard, the U.S. EPA’s Green Power Partnership, and Climate Leaders, would establish even greater consistency in the market. This is why we are proposing that RECs must be generated the first 3 months of the following calendar year as opposed to the 6 months found in the current *GL TRCs Program Standard*.

2.3. Electricity Delivery to the Grid

[Addition]:

33. **EcoLogo™ RECs** must be generated by the actual amount of electricity delivered to the grid, and not the facility’s capacity.

34. The facility that generated the electricity, and associated **EcoLogo™ RECs**, must be connected to the grid. Off-line facilities are not eligible to produce **EcoLogo™ RECs**.

Rationale:

The EcoLogo™ Program proposes to add the current statements from the *GL TRCs Program Standard* almost verbatim into the renewable low-impact electricity standard because they are still valid. The only changes proposed from the *GL TRCs Program Standard* would be the new “EcoLogo™” branding of the electricity products, instead of the “Green Leaf™” branding.

2.4. Verification Requirements

[Addition]:

53. The **EcoLogo™** Program, TerraChoice, and their representative agents shall not, without the Licensee's prior written consent, or except as may be required by law, voluntarily disclose any information obtained that the Licensee advises (in writing at the time such information is obtained) is confidential, unless such information is:

- (a) already known by the **EcoLogo™** Program , TerraChoice or their representative agents;
- (b) otherwise available to the public; or
- (c) subsequently legally acquired from other sources without any such restriction.

54. To verify that the **RECs** and the electricity that generated them meet the criteria stipulated in this Standard, the **EcoLogo™** Program will require access, as is its normal practice, to relevant quality control, production, and transactional records, and the right of access to electricity generation facilities on an announced basis.

55. Prior to certification of the **RECs**, the facility generating the renewable low-impact electricity, must be verified and audited by the **EcoLogo™** Program, to ensure that it meets the **general** requirements stipulated in **this standard**. **If the facility has already been certified as meeting the general requirements in this standard, this initial verification and audit procedure is not required.**

56. An audit and verification of all **EcoLogo™ RECs** transactions must be performed on an annual basis.

57. This audit and verification must be performed by an accredited third party. Internal audits performed by certified internal auditors will not be accepted as ongoing proof of compliance.

58. The verification and audit process will make use of various company documents including, but not limited to, power purchase agreements, contracts, invoices, billing statements, and other purchasing documents.

59. **EcoLogo™** Program audit checklists, Sufficient Evidence Documents, and other verification process documentation must be followed for all verification procedures.

60. The **EcoLogo™** Program may perform random surveillance verification of electricity generation facilities and/or the **RECs** transactions.

Rationale:

The EcoLogo™ Program proposes to add the current statements from the *GL TRCs Program Standard* almost verbatim into CCD-003 because they are still valid. The only changes proposed from the *GL TRCs Program Standard* would be the new “EcoLogo™” instead of the “Green Leaf™” branding of the electricity products. Also, point 32 would change slightly. Instead of having to comply with the technical requirements of the *GL TRCs Standard*, the facilities would have to meet the general facilities requirements of the CCD-003 standard. These are the same facility requirements, so the change proposed for this point is only one of semantics.

2.5. RECs Sales

[Addition]:

42. Any party that proposes to or actually sells **EcoLogo™ RECs** must be a licensee of the **EcoLogo™** Program. This includes both initial and downstream sales.

44. Final end-use parties do not have to be licensed by the Program.

45. For a one-time use basis, the final end-use party is eligible to become an Authorized User, and use the **EcoLogo™ RECs** symbol and/or the words “**EcoLogo™**” or “**EcoLogo™ RECs**” in their own marketing and communications materials, if all of the following conditions are met:

(a) The methodology used to determine or estimate the percentage of total load must be approved by the **EcoLogo™ RECs** Program.

(b) The final end-use party must have signed an Authorized User Agreement with the **EcoLogo™** Program.

(c) The **EcoLogo™ RECs** symbol and/or the words “**EcoLogo™**” or “**EcoLogo™ RECs**” must be accompanied by a criteria statement indicating the percentage of total electricity load represented by the **RECs**.

(d) The **EcoLogo™ RECs** symbol and/or the words “**EcoLogo™**” or “**EcoLogo™ RECs**” must not be used in a manner that misrepresents the Program, the reasons for certification, or what **RECs** are.

Rationale:

The EcoLogo™ Program proposes to add the current statements from the *GL TRCs Program Standard* pertaining to REC sales almost verbatim into CCD-003 because they are still valid. Points 19 and 22 will provide protection to consumers. The only changes proposed from the *GL TRCs Program Standard* statements would be the new “EcoLogo™” branding of the electricity products instead of the “Green Leaf™” branding.

2.6. Avoiding the Double Counting of RECs

[Addition]:

28. In no way can the environmental attributes associated with the **RECs** be counted more than one time.

(a) The environmental attributes associated with the renewable low-impact electricity in comparison to the null electricity it offsets from the grid must not have been sold or otherwise separated from the electricity, and then delivered to any other user besides the final end-use party.

(b) Prior to being passed on or sold to the final end-use party, the **RECs**, the environmental attributes, or the electricity that generated them must not have been used to meet a regulatory requirement including *inter alia*:

- cap-and-trade programs;
- emissions control programs;
- renewable portfolio standards;
- air emission regulatory limits for the generating facility.

(c) Prior to being passed on or sold to the final end-use party, the **RECs** or the electricity that generated them must not have been used to meet a non-regulatory mandate including *inter alia*:

- fulfilling governmental procurement policies;
- fulfilling private sector procurement policies;
- calculating another company's or institution's portfolio mix.

(d) **RECs** cannot be passed on, sold to, or retired/donated on behalf of more than one final end-use party.

31. The electricity from which the **EcoLogo™ RECs** came can in no way be represented or sold as "green", as renewable low-impact or as having low environmental impacts.

43. All Program licensees must notify the Program of any and all **EcoLogo™ RECs** transactions and/or sales.

Rationale:

According to Green-e (2008), the common instances of double counting pertaining to RECs include:

- *When the same RECs are sold to more than one party.*
- *When the same RECs are claimed by more than one party, including any expressed or implied environmental claims made pursuant to electricity coming from a renewable energy resource, environmental labeling or disclosure requirements.*
- *When the same REC is used by an electricity provider or utility to meet an environmental mandate, such as an RPS, and is also used to satisfy customer sales.*
- *When a REC is simultaneously sold to represent 'renewable electricity' to one party, and one or more attributes are also sold, (such as CO₂) associated with the same MWh of generation, to another party.*

The EcoLogo™ Program thinks that the current *GL TRCs Program Standard* adequately prevents all of the common instances of double counting, pertaining to Renewable Energy Credits outlined above, from occurring. Therefore, we propose to add the *GL TRCs Program Standard* statements pertaining

(G) TRADEABLE RENEWABLE ENERGY CERTIFICATES

to double counting almost verbatim into CCD-003. Again, the only changes required to the *GL TRCs Program Standard* statements include substituting “TRCs” for “RECs” and “Green LeafTM” for “EcoLogoTM”.

2.7. Assigning Ownership of RECs

[Addition]:

27. **RECs** must be either passed on or sold to the final end-use party (or owner) or be retired on behalf of the final end-use party.

35. Only the final end-use party (or owner) can make any claims about the **RECs**. This includes any printed, electronic, or broadcast materials.

36. **EcoLogoTM RECs** can only be claimed, used, retired, sold, and/or donated by the final end-use party. The decision to claim, use, retire, sell, and/or donate the **RECs** can only be made or agreed to by the final end-use party.

37. The final end-use party can claim, use, or retire **EcoLogoTM RECs** one time only. Once claimed, they may no longer be used, sold, donated, or claimed in any other way.

38. **EcoLogoTM RECs** are considered to be automatically retired when the one of the following actions occurs:

(a) A party promotes itself in association with the **EcoLogoTM RECs**, as owning the **RECs**, as owning the associated environmental benefits, or as participating in the **EcoLogoTM RECs** Program.

(b) The **RECs** have been used to meet a regulatory requirement including *inter alia*:

- cap-and-trade programs;
- emissions control programs;
- renewable portfolio standards;
- air emission regulatory limits for the generating facility.

(c) The **RECs** have been used to meet a non-regulatory mandate including *inter alia*:

- fulfilling governmental procurement policies;
- fulfilling private sector procurement policies;
- calculating another company’s or institution’s portfolio mix.

39. The final end-use party is eligible to become an Authorized User and use the **EcoLogoTM RECs** symbol, and/or the words “**EcoLogoTM” or “EcoLogoTM RECs”** in their own marketing and communications materials if all of the following conditions are met:

(a) The final end-use party must have signed an Authorized Use License Agreement with the **EcoLogoTM Program**.

(b) The **EcoLogo™** RECs symbol and/or the words “**EcoLogo™**” or “**EcoLogo™ RECs**” must be accompanied by a criteria statement indicating the percentage of total electricity load represented by the RECs.

(c) The **EcoLogo™** Program must review and approve of all marketing and communications materials using **EcoLogo™** RECs symbol and/or the words “**EcoLogo™**” or “**EcoLogo™ RECs**”.

Rationale:

The **EcoLogo™** Program thinks that the current *GL TRCs Program Standard* sufficiently ensures clarity about the ownership of RECs. Therefore, we propose to add the *GL TRCs Program Standard* statements pertaining to ownership almost verbatim into CCD-003. Again, the only changes required to the *GL TRCs Program Standard* statements include substituting “TRCs” for “RECs” and “Green Leaf™” for “**EcoLogo™**”.

2.8. Aggregation of Environmental Attributes

[Addition]:

25. RECs must have attached all of the relevant environmental attributes associated with the generation of the renewable low-impact electricity to the full extent possible based on current regulatory and legal requirements. In other words, the RECs must represent all of the environmental attributes associated with the offsetting of the same quantity of null electricity from the grid.

Rationale:

The **EcoLogo™** Program agrees with the majority of stakeholders that RECs should remain aggregated (include all the environmental attributes) to the full legal extent possible. This will allow **EcoLogo™** RECs to continue to reflect the common market definition of RECs. Aggregation is one of the measures which can help avoid double counting of environmental attributes. Therefore, we propose to add point 3 of the current *GL TRCs Program Standard* almost verbatim into CCD-003, again with a minor replacement of the word “TRCs” for “RECs”.

2.9. Tax Incentives

[Addition]:

30. RECs that are generated by facilities receiving or obtaining tax incentive payments are eligible to be designated as “**EcoLogo™** RECs” to the extent possible under laws, regulations, and contractual arrangements governing the tax incentive programs.

Rationale:

The **EcoLogo™** Program thinks that point 7 of the *GL TRCs Program Standard* is still legally sound. Therefore, we propose to add this *TRCs Program Standard* statement into CCD-003 while substituting “TRCs” for “RECs” and “Green Leaf™” for “**EcoLogo™**”.

2.10. Disclosure to Regulators

[Addition]:

46. Where law requires notification, the provincial or state energy board and/or agency regulating the generation and sale of electricity must be notified of any **EcoLogo™ RECs** transaction. This includes the board and/or agency with authority in the areas where the renewable low-impact electricity is generated and where the **EcoLogo™ RECs** product is sold, passed on or retired.

Rationale:

The EcoLogo™ Program thinks that point 23 of the *GL TRCs Program Standard* is still legally sound. Therefore, we propose to add this *TRCs Program Standard* statement into CCD-003 while substituting “TRCs” for “RECs” and “Green Leaf™” for “EcoLogo™”.

2.11. Product Information Disclosure Requirements

[Addition]:

47. **EcoLogo™ RECs** must be accompanied by product disclosure information that includes, as a minimum, the following information:

- (a) a description of what a renewable electricity certificate is;
- (d) the physical location of the generation facility (i.e. province/state and country); and
- (e) the resource(s) used to generate the renewable low-impact electricity and the percentages of each used in the generation.

48. The product disclosure information cannot represent that the electrons received by the final end-use party are from a specific electricity generation facility, even though the **EcoLogo™ RECs** may represent the environmental attributes from that facility.

49. Product disclosure information must be delivered with the **EcoLogo™ RECs** to the final end-use party with each sale and/or billing invoice.

50. Information clearly explaining what **EcoLogo™ RECs** are must be provided to any and all customers and final end-use parties prior to their subscription for **EcoLogo™ RECs**. This applies to all kinds of subscription programs including those that are internet-based.

51. The product disclosure information can be presented as a label, official certificate, information pamphlet, and/or website information. A copy of all product disclosure and/or explanatory wording (in its final format for release or publication) must be provided to the **EcoLogo™ RECs** Program.

52. The **EcoLogo™ RECs** symbol and/or the words “**EcoLogo™**” or “**EcoLogo™ RECs**” must not be used in a manner that misrepresents the Program, the reasons for certification, or what **RECs** are.

Rationale:

The EcoLogo™ Program proposes to add the current statements from the *GL TRCs Program Standard* pertaining to product disclosure requirements almost verbatim into the renewable low-impact

electricity standard because they are still valid. This addition will again only include a substitution of “Green LeafTM” for “EcoLogoTM” and “TRCs” for “RECs”.

2.12. Licensing

[Addition]:

61. The Chief Executive Officer or the equivalent officer of the Licensee (retail/wholesale marketer, commercial marketer, or resale marketer) must sign a License Agreement for participation in the **EcoLogoTM** Program.

(a) Retail/wholesale marketers and commercial marketers must sign a Primary Use License Agreement.

(b) Resale marketers must sign a Secondary Use License Agreement.

62. The Chief Executive Officer or the equivalent officer of the Licensee (retail/wholesale marketer, commercial marketer or resale marketer) must sign an Attestation of Compliance that states:

(a) all steps of the process required to generate **RECs** meet the requirements of all applicable governmental acts, by laws, and regulations including, for facilities located in Canada, the *Fisheries Act* and the *Canadian Environmental Protection Act (CEPA)*;

(b) the **RECs** product to be certified presently meets all applicable criteria as defined in the **EcoLogoTM** Standard.

63. The **EcoLogoTM** Program must be advised in writing immediately by the Licensee of any noncompliance that may occur during the term of the license. On the occurrence of any such noncompliance, the license may be suspended or terminated as stipulated in the License Agreement.

64. The Licensee must pay annual fees to the **EcoLogoTM** Program. These fees are outlined in the **EcoLogoTM** RECs Fee Schedule.

Rationale:

The **EcoLogoTM** Program proposes to add the current statements from the *GL TRCs Program Standard* pertaining to licensing almost verbatim into the renewable low-impact electricity standard because they are still valid. This addition will again only include a substitution of “Green LeafTM” for “EcoLogoTM” and “TRCs” for “RECs”.

3. Revised Criteria Statement to the Current Active Standard

Following preliminary research and a discussion with stakeholders, the **EcoLogoTM** Program will address the following environmental impact categories and related stressors, by proposing to revise certain criteria statements to the current active standard. Each proposed criteria statement is followed by a rationale explaining why we are proposing the revision to the standard. Only those topics that were discussed with stakeholder will be presented below.

3.1. Differentiating between Bundled and Unbundled Electricity Products

[Revision]:

Category Definition

2. This category comprises **two renewable low-impact electricity products** which are apt to impose relatively low impacts on the environment and produce potential benefits including, inter alia, low net greenhouse gas emissions, limited or no depletion of non-renewable resources, reduced emissions of other pollutants, and reduced impacts on aquatic, riparian and terrestrial ecosystems and species.

These two products are:

- A. *Bundled Renewable Low-Impact Electricity*
- B. *Renewable Energy Certificates (RECs)*

The bundled renewable low-impact electricity and RECs recognized in this standard must come from these generating technologies:

- (a) alternative-use electricity;
- (b) biogas-fuelled electricity;
- (c) biomass-fuelled electricity;
- (d) geothermal-powered electricity;
- (e) hydro-powered electricity;
- (f) solar-powered electricity;
- (g) tidal & wave-powered electricity;
- (h) wind-powered electricity

These products must also meet the general requirements and product specific requirements outlined in this standard.

Interpretation

“bundled renewable low-impact electricity” means a bundled transaction in which the environmental attributes and electricity are sold together;

[Current:]

Category Definition

2. This category comprises electricity from renewable energy sources which are apt to impose relatively low impacts on the environment and produce potential benefits including, *inter alia*, low net greenhouse gas emissions, limited or no depletion of non-renewable resources, reduced emissions of other pollutants, and reduced impacts on aquatic, riparian and terrestrial ecosystems and species. Generating technologies specifically recognized in this criteria document include:
 - (a) alternative-use electricity;
 - (b) biogas-fuelled electricity;
 - (c) biomass-fuelled electricity;
 - (d) solar-powered electricity;
 - (e) water-powered electricity; and
 - (f) wind-powered electricity.

Rationale:

The EcoLogo™ Program has decided that RECs should be included in CCD-003 because the market for RECs is growing, and because of the similarity between RECs and bundled electricity products.

4. Considerations Withdrawn from Review

Following preliminary research and a discussion with stakeholders, the EcoLogo™ Program has withdrawn the following environmental considerations from this review. Only those topics that were discussed with stakeholder will be presented below. There, we also provide a rationale explaining why we have decided not to address these considerations further during this review.

4.1. RECs as Potential Subsidies for Projects in Development

While discussing with stakeholders, it seemed clear that most stakeholders believed that RECs should only be associated to generators actually producing electricity and not to future producers. RECs as potential subsidies for projects in development are viewed as too risky for consumers and too difficult to verify. Therefore, the EcoLogo™ Program does not think it necessary to further consider this issue during this review of CCD-003.

4.2. RECs as Additional Emissions Offsets Beyond Business As Usual

Rationale:

See section *Differentiating between RECs and GHG Offsets* below.

4.3. Quantifying Additionality of Environmental Benefits

See section *Differentiating between RECs and GHG Offsets* below.

4.4. Addressing the Interaction of RECs (including RECs as Additional Emissions Offsets) with Different Regulatory Regimes

See section Differentiating between RECs and GHG Offsets below.

4.5. Differentiating between RECs and GHG Offsets

Following preliminary research and a discussion with stakeholders, it seemed clear that stakeholders believed that RECs and emissions offsets markets should remain separate and should not be addressed in the same standard. In fact, Green-e in the U.S. has done just that and has two separate programs to certify RECs and greenhouse gas emissions offsets. Furthermore, it is clear that stakeholders did not agree with Gillenwater's (2007a-2007b) proposal outlined in the *TRCs Certification Discussion Document*. At this time, the EcoLogo™ Program does not intend to pursue the design of a program for greenhouse gas emissions offsets that pertains to electricity. Therefore, we do not think it necessary to further elaborate on this topic in this review.

5. Unresolved Issues

Following preliminary research and a discussion with stakeholders, the EcoLogo™ Program has not been capable of resolving certain issues. Indeed, no clear direction could be found indicating how EcoLogo™ should address these issues, although in certain cases, several proposals were brought forward. The goal of the EcoLogo™ Program is to determine whether these issues can be resolved, and what criteria statement could be included in the standard. Only those topics that were discussed with stakeholder will be presented below.

5.1. Type of Electricity Age

See *Age of Facilities* section of *General Considerations Background Notes* presented elsewhere for the review of CCD-003.

5.2. Mandating Tracking Systems

Following preliminary research and a discussion with stakeholders, the EcoLogo™ Program is still uncertain as to how to proceed regarding the tracking of RECs. Some stakeholders believed that tracking systems provide a useful and important tool in the prevention of double counting, and recommend their use where available. Also, some believe that facilities should only be registered with one tracking system to ensure that no double counting of renewable energy generation occurs. However, others disagree and think that facilities should be allowed to sell their RECs in different markets through different tracking systems. The EcoLogo™ Program understands how it would be easier to verify the REC sales of facilities registered in only one tracking system VS in multiple tracking systems to ensure that no double counting is occurring. However, we also understand that this could limit the salability of the product. Therefore, we would like stakeholders to choose among these two proposal options and provide a reason.

[Proposal A]:

The EcoLogo™ Program should mandate the use of only one tracking system in CCD-003.

[Proposal B]:

The EcoLogo™ Program should not mandate the use of only one tracking system in CCD-003

6. References

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