

**TREATMENT OF ENVIRONMENTAL ATTRIBUTES ACROSS TRACKING SYSTEMS**  
**Environmental Tracking Network of North America (ETNNA)**  
**Summary of and Response to Stakeholder Comments:**  
**Third Stakeholder Comment Period**

This document summarizes the major comments received during the third stakeholder comment period, and provides a summary of ETNNA responses. Two sets of comments were received, representing four organizations.

## **1. Certificate Definitions**

### Stakeholder Comments

Some stakeholders felt that tracking systems should not have a definition of RECs or that their definition should be conservative and limited to a common denominator. There was also some concern that fossil-fuel generators would claim the emissions reductions created when renewable energy is generated, creating a double-counting scenario. Another stakeholder comment indicated that tracking systems should explicitly track what is or is not included in each REC instead of having a definition of what is included.

### ETNNA Recommendation

All but one of the tracking systems have a definition for RECs that says that they must be whole and include emissions benefits (these definitions are in the appendix of the discussion paper).

As state regulators oversaw the development of the various regional tracking systems that currently exist, they used a broad REC definition that encompassed the environmental attributes referenced by the most comprehensive state RPS and voluntary market definitions in order to meet the needs of all state RPS and green power programs that would be using their system. This approach is consistent across all the existing tracking systems except NE/GIS<sup>1</sup> and ETNNA recommends that this approach be continued. This broad REC definition accommodates the widest group of tracking system users while allowing for more restrictive definitions and eligibility requirements within individual programs.

As states, regions and ultimately the Federal government enact greenhouse reduction policies, the implementation details of these programs will inform the definition of what is included in a REC depending upon a number of factors such as where the generator is located, when the facility became operational, and who is buying the RECs. Therefore REC definitions may change over time and for specific jurisdictions depending upon future greenhouse gas policies. But for the present, the definitions currently in use should be maintained.

## **2. REC Requirements versus Explicit Tracking**

### Stakeholder Comments

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<sup>1</sup> Since there is now a greenhouse cap & trade system in New England (RGGI) and since RECs that are sold in the voluntary RE market are being handled through RGGI, this is a non-issue for NE/GIS.

There was a request to have all tracking systems include direct emissions data for renewable energy, which in most cases is zero except in the case of biomass fuels and some minor emissions related to geothermal.

ETNNA Recommendation

At this time it is probably not administratively necessary or cost effective for renewable generation tracking systems to explicitly track direct GHG emissions from renewable energy facilities. Non-zero direct emissions are generally captured and monitored by regional air resources boards. If stakeholders and tracking systems would like this information to calculate carbon neutral claims, it is recommended that these tracking systems interface with the air resources boards as the source of that emissions data.