



## EPA's Green Power Partnership

# Partnership Requirements



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## Summary

- Partner organizations can join at a facility level up to an organization-wide commitment (U.S. facilities only).
- Partner organizations must buy green power in amounts proportional to their annual electricity use.
- Eligible renewable resources include wind, solar, geothermal, qualifying biomass, and low-impact hydropower.
- Partner organizations can meet the minimum purchase requirements with any of the following products (either singly or in combination): renewable energy certificates (RECs), utility green pricing products, utility green marketing products, or onsite power generation from eligible renewable resources.
- Partner organizations must meet the minimum purchase requirements with electricity produced from “new” renewable facilities.
- EPA holds the right to reevaluate and update the Partnership requirements at any time.



# EPA's Green Power Partnership: Partnership Requirements

## Contents

I. Introduction .....	3
II. Eligible Organizations .....	3
III. Scope of Participation .....	3
IV. Incremental Green Power Requirement .....	3
V. Yearly Reporting Requirement .....	4
VI. Minimum Purchase Requirement .....	4
VII. Green Power Leadership Club Purchase Requirement (Optional) .....	6
VIII. Energy Efficiency Improvements and Buying Green Power.....	6
IX. Eligible Sources of Green Power .....	6
X. Eligible Green Power Products.....	7
XI. Guidance on Purchasing Texas RECs from Non-wind Facilities .....	7
XII. Locating Green Power Products .....	7
XIII. “New” Renewables Purchase Requirement.....	8
XIV. Green Power Vintage Requirement .....	8
XV. Product Certification.....	9
XVI. Environmental Claims Guidance.....	9
XVII. Partner Recognition .....	10
XVIII. Partner Suspensions .....	11
XIX. Partnership Requirements Updates .....	11
XX. Contact EPA's Green Power Partnership.....	11
Appendix A – Eligible Green Power Resources .....	A-1
Appendix B – Co-firing of Eligible Biomass .....	B-1
Appendix C – Partnership Agreement .....	C-1
Appendix D – Partner Yearly Report .....	D-1





# EPA's Green Power Partnership Partnership Requirements



## I. Introduction

This document outlines the requirements for joining EPA's Green Power Partnership (GPP). The GPP is a voluntary program supporting the increased use of green power to reduce the environmental impacts associated with conventional electricity use. This document complements the requirements presented in the program Partnership Agreement (see Appendix C).

## II. Eligible Organizations

The Partnership is open to all organizations operating within the United States, except for sellers, suppliers, or marketers of green power (i.e., "providers"). Partnership-eligible organizations include:

- Publicly- and privately-held corporations
- Federal, state, and local government agencies
- Nonprofits
- Educational institutions

Providers are those organizations that sell, supply, or market green power products. Providers may include: utilities; renewable energy certificate sellers, brokers or distributors; onsite renewable services providers; and others. EPA reserves the right to withhold partnership to any organization that is perceived as a seller, supplier, marketer, or provider of green power products. The Partnership works with providers under a separate framework.

Individuals and private residences are not eligible to join the GPP, but they may find the information and resources available through the Partnership useful in finding, evaluating, and buying green power products.

## III. Scope of Participation

There are two levels at which an organization may join the GPP:

1. Organization-wide (U.S. operations only)
2. Single facility or any logical aggregation of facilities less than organization-wide

This flexibility provides organizations the opportunity to refine their green power procurement strategies as they expand their commitment over time.

Only organizations joining at the organization-wide level are eligible for Green Power Leadership Club distinction (see Section VII) and inclusion on the GPP's 100% Purchasers list.

The Partnership requires that Partners with branded franchise<sup>1</sup> facilities clearly state in any public disclosure whether or not the purchase scope includes such branded facilities. EPA requires this disclosure since franchised facilities not owned by a Partner may still be branded with the Partner's name, and as a result a Partner's claim of purchasing green power may give the impression that similarly branded but independently operated facilities are also purchasing green power.

Partners may claim to be purchasing "organization-wide" (U.S. facilities only), meaning facilities owned and operated by the Partner—but excluding franchise facilities—or including co-branded or facilities operating under franchise agreements. Either way, the Partner may claim to be using green power, but the chosen organizational categorization must be clearly stated in any public disclosure. Partners purchasing organization-wide (under either scope) are eligible for the Green Power Leadership Club and the 100% Purchasers list.

With respect to rented or leased space, only the party purchasing the green power may make environmental claims. This will avoid both the lessor and the lessee making claims on the same green power. However, both renter and owner may buy green power for a single facility in order to make the same green claims about that facility.

## IV. Incremental Green Power Requirement

EPA recognizes only voluntary green power purchases that increase Partners' green power use above mandatory requirements, such as state renewable portfolio standards (RPS), mandates placed on utilities, or load-serving entities or consent decrees. All green power purchases counted by the GPP must be incremental to what the Partner would have bought absent proactive green power procurement.

<sup>1</sup> A franchise agreement constitutes any agreement in which one organization's products, brand name, business model, facility, operational structure, or other goods and services are granted to another organization.

## EPA's Green Power Partnership: Partnership Requirements

In each of the following examples, renewable electricity generation is not considered green power and does not reflect an environmental benefit for which the Partner could claim credit:

1. Renewable electricity generation is used to satisfy RPS mandates or goals imposed by federal, state or local governments on utilities or load serving entities.
2. Renewable electricity generation is included in an undifferentiated power product (e.g., standard electricity service or utility system mix).
3. Renewable electricity generation is being paid for by all customers (e.g., in a utility's standard rates).
4. Renewable electricity generation comes from an eligible renewable generator that has been mandated by a local, state or federal government agency (e.g., in a consent decree).
5. Renewable electricity generation is purchased instead of paying a system benefits charge for renewable electricity (e.g., a self-directed system benefits charge).
6. Renewable electricity generation is purchased as part of a Supplemental Environmental Project (SEP) under a Clean Air Act enforcement action.

The following are circumstances in which EPA has recognized a purchase of renewable electricity generation incremental:

1. The purchase is a result of an obligation placed on federal, state, or local government agencies as end-users of energy via a state or federal executive order.
2. The purchase is included as a voluntary measure in a State Implementation Plan (SIP) under the federal NOX Budget Cap and Trade Program. Although SIPs are mandated, they do not set mandatory requirements for the use or purchase of renewable energy. Therefore, a purchase of green power under a SIP is considered a voluntary purchase.

### V. Yearly Reporting Requirement

Partners are asked to update EPA when a change occurs to their green power purchase or partnership status. In addition, each year, the GPP will provide each Partner's primary contact with a Partner Yearly Report summarizing the organization's current green power purchase and partnership status. Partners must review, update, and return the Partner Yearly Report to EPA. Partners that fail to return a Partner

Yearly Report or otherwise provide an update to EPA risk suspension. For additional information, please see Section XVIII (Partner Suspensions).

A blank version of the Partner Yearly Report is available in Appendix D. Partners can review the data EPA has on file for their organization by requesting a completed version of the Partner Yearly Report from the GPP.

### VI. Minimum Purchase Requirement

EPA requires that Partners meet a minimum percentage of their annual electricity use with green power. Partners should calculate their annual purchased electricity use in accordance with their organization's scope of participation (i.e., facility level or up to organization-wide) in the GPP.

Partners have up to six months from the date they submit a Partnership Agreement to buy green power in amounts that meet or exceed EPA's minimum purchase requirements.

Partners must meet their minimum purchase requirement with "new" renewable resources. Partners who enter into contracts for existing renewables before June 30, 2009, and exceed the minimum purchase requirement have the choice to meet the amount over the minimum requirement with green power from existing generating facilities (i.e. those built before 1/1/1997). However, any existing renewables purchased or generated onsite by Partners under this condition will be recognized by the Partnership for no more than one 12 month period. For contracts initiated after June 30, 2009, only "new" renewables will be eligible for the GPP. Partners joining the program after June 30, 2009 may not use pre-June 30, 2009 purchase contracts that include existing renewables.

All Partners' purchase contracts for existing renewables or onsite use of existing renewables reported to EPA before February 19, 2009, will be recognized by the Partnership for the duration of the contract or up to a period not to extend past January 1, 2012. For additional information, see Section XIII ("New" Renewables Purchase Requirement).

For a purchase to qualify for the GPP, Partner organizations must retire, or not resell, the RECs associated with their green power purchase. An organization's green power supplier may retire the RECs on a Partner's behalf. This requirement prevents two different parties claiming the same green power benefits.

## EPA's Green Power Partnership: Partnership Requirements

Owners of onsite systems that sell the RECs associated with the system may no longer claim that the electricity they are using is renewable. The electricity generated from an onsite system where the RECs have been sold does not qualify in meeting EPA purchase requirements. Partners may, however, replace the RECs sold from an onsite system through a secondary green power purchase in order to qualify for the GPP.

### Assessing Your Organization's Minimum Purchase Requirement

Organizations can take the following steps to assess their minimum green power purchase requirement:

1. Decide the organization's scope of partnership (i.e., facility level up to organization-wide / U.S. operations only).
2. Calculate the total annual electricity use for the scope of partnership. Organizations can use recent utility bills to estimate their projected electricity use.

3. Organizations that have no access to or control over electricity use or billing data (e.g., for leased space) can estimate total electricity use based on square footage. Multiply the total square footage of your chosen scope of partnership by a factor of 14.9 kWh/sf/year (or .0149 MWh/sf/year). This is a national average for U.S. commercial buildings of all space types<sup>2</sup>.
4. Organizations can use the table below to find the kilowatt-hours (kWh) range for their annual electricity use (i.e., their "baseload") and identify the corresponding percentage of green power required to meet EPA's minimum requirements.

EPA will periodically review and update the minimum purchase requirements to keep pace with the market and buyer patterns.

**Table I: Minimum Purchase Requirements**

Your Organization's Baseload	Minimum Purchase Requirements Before January 1, 2011 <sup>1</sup>	Minimum Purchase Requirements After January 1, 2011 <sup>1</sup>
If your annual electricity use in Kilowatt-hours is...	You must, at a minimum, buy this much green power within six months of joining the Partnership	You must, at a minimum, buy this much green power within six months of joining the Partnership
≥ 100,000,001 kWh	2% of your use	3% of your use
10,000,001 - 100,000,000 kWh	3% of your use	5% of your use
1,000,001 - 10,000,000 kWh	6% of your use	10% of your use
≤ 1,000,000 kWh	10% of your use	20% of your use

<sup>1</sup> The minimum purchase in kilowatt-hours (kWh) must be greater than the highest possible requirement in kilowatt-hours for the next lower benchmark level. For example, an organization with a baseload electricity use of 100,000,500 kWh (2 percent benchmark level) would be required to buy 3,000,000 kWh a year minimum, which equals the highest possible requirement for the 3 percent benchmark category.

<sup>2</sup> Energy Information Agency, Commercial Buildings Energy Consumption Survey 2003 (CBECS): [http://www.eia.doe.gov/emeu/cbeecs/cbeecs2003/detailed\\_tables\\_2003/2003set15/2003pdf/c14a.pdf](http://www.eia.doe.gov/emeu/cbeecs/cbeecs2003/detailed_tables_2003/2003set15/2003pdf/c14a.pdf)

# EPA's Green Power Partnership: Partnership Requirements

## VII. Green Power Leadership Club Purchase Requirement (Optional)

The Green Power Leadership Club (GPLC) honors Partners that substantially exceed EPA's minimum purchase requirements for an organization-wide commitment. EPA automatically includes all Partner organizations making qualifying green power purchases in the GPLC. No added paperwork is needed. EPA does not limit the total number of organizations in the GPLC.

The GPLC is open only to Partners that are joining organization-wide across all U.S. operations.

EPA identifies each Partner meeting the minimum GPLC purchase requirement as a GPLC member on the GPP Web site. Qualifying Partners also receive a GPLC plaque.

Partners must meet the entire minimum GPLC purchase requirement with "new" renewable resources. Please refer to Section XIII ("New" Renewables Purchase Requirement) for more information.

Table 2 below identifies the GPLC percentage purchase requirement relative to an organization's baseload.

## VIII. Energy Efficiency Improvements and Buying Green Power

EPA encourages Partners to pursue energy efficiency improvements and can refer Partners to ENERGY STAR® for more information. Efficiency efforts may reduce Partners' total electric-

ity use. The GPP requires that Partners provide a yearly update on electricity load and green power purchasing (see Section V Partner Yearly Report). Partners can report efficiency-related reductions in total electricity consumption through this process.

## IX. Eligible Sources of Green Power

The GPP defines "green power" as a subset of renewable energy that encompasses those renewable resources and technologies that provide the highest environmental benefit.

Green power facilities must generate electricity with zero anthropogenic (i.e., human-caused) emissions and have an environmental profile superior to conventional power generation.

EPA requires that a Partner's full minimum purchase requirement be supplied from U.S.-based facilities built since the beginning of the voluntary market (January 1, 1997).

The following are eligible green power resources:

- Solar photovoltaic
- Wind
- Geothermal
- Hydropower certified by the Low-Impact Hydro Institute. EPA will honor green power contracts in place before April 30, 2006 from hydropower installations of less than 30-megawatt capacity until those contracts expire (see Appendix A)

**Table 2: Green Power Leadership Club Purchase Requirements**

Your Organization's Baseload	Green Power Leadership Club Purchase Requirements Before January 1, 2011 <sup>1 2 3</sup>	Green Power Leadership Club Purchase Requirements After January 1, 2011 <sup>1 2 3</sup>
<i>If annual electricity use (kilowatt-hours) is...</i>	<i>Partner must, at a minimum, buy this much green power across its entire U.S. operations</i>	<i>Partner must, at a minimum, buy this much green power across its entire U.S. operations</i>
≥ 100,000,001 kWh	20% of your use	30% of your use
10,000,001 - 100,000,000 kWh	30% of your use	50% of your use
1,000,001 - 10,000,000 kWh	60% of your use	100% of your use

<sup>1</sup> Partners with an annual electricity use of less than 1 million kilowatt-hours (kWh) a year are not eligible for the GPLC. EPA recognizes separately Partners that fall in this size category and buy 100 percent green power.

<sup>2</sup> Partners must meet the minimum GPLC purchase requirement entirely with "new" renewables.

<sup>3</sup> The minimum purchase for the GPLC in kilowatt-hours (kWh) must be greater than the highest possible requirement in kilowatt-hours for the next lower benchmark level. For example, an organization with a baseload electricity use of 100,000,500 kWh (20 percent benchmark level) would be required to buy 30,000,000 kWh a year minimum, which equals the highest possible requirement for the 30 percent benchmark category.



## EPA's Green Power Partnership: Partnership Requirements

- Eligible biomass (see Appendix A)
- Co-firing of eligible forms of biomass with non-renewables (acceptable under certain conditions as defined in Appendix B)
- Biodiesel-fueled (B100) generators
- Fuel cells using eligible fuel sources listed above

For a more extensive explanation of eligible sources of green power, please refer to Appendix A.

### X. Eligible Green Power Products

Partners have significant flexibility in choosing types and combinations of green power products. The following product types are acceptable:

- Renewable energy certificates (RECs)
- Future RECs (see vintage requirements in Section XIV)
- Utility green pricing products (in regulated utility markets)
- Utility green marketing products (in deregulated utility markets)
- Onsite power generation from eligible renewable resources

The eligible green power content of utility green marketing or utility green pricing products may vary. EPA recognizes only the eligible green power portion of a product toward fulfilling the GPP's purchase requirements. For example, if an organization is buying a utility green power product composed of 50 percent wind power, 10 percent large hydropower, and 40 percent conventional power, only the 50 percent of that purchase derived from wind power qualifies for meeting EPA's minimum purchase requirement. Neither the large hydropower nor the conventional power qualifies, as described in Section IX (Eligible Sources of Green Power).

### XI. Guidance on Purchasing Texas RECs from Non-wind Facilities

Texas Renewable Energy Credits (RECs) from non-wind facilities that qualify for Compliance Premiums (CPs) are eligible to meet the Partnership's purchase requirements if the RECs and an equal amount of CPs from the same generating unit are purchased and retired on behalf of the voluntary purchaser in the same year. This will allow the Partner on whose behalf

the RECs and CPs were retired to make a complete renewable energy claim regarding the non-wind renewable megawatt-hours (MWh) they used to satisfy the GPP requirements. This policy applies to all non-wind renewable energy supply generated in Texas on or after January 1, 2008. This policy does not affect Texas RECs obtained from (1) non-wind facilities installed and REC-certified by the Public Utility Commission of Texas on or before September 1, 2005, as these facilities do not qualify for CPs, and, (2) energy generated from non-wind facilities on or before December 31, 2007, as CPs are awarded for each REC only for energy generated after December 31, 2007.

Below is the Substantive Rule 25.173(l)

- (l) Target for renewable technologies other than wind power. In order to meet the target of at least 500 MW of the total installed renewable capacity after September 1, 2005, coming from a renewable energy technology other than a source using wind energy as set forth in subsection (a)(1) of this section, the program administrator shall award compliance premiums to certified REC generators other than those powered by wind that were installed and certified by the commission pursuant to subsection (n) of this section after September 1, 2005. A compliance premium is created in conjunction with a REC.
- (1) For eligible non-wind renewable technologies, one compliance premium shall be awarded for each REC awarded for energy generated after December 31, 2007.
- (2) Except as provided in this subsection, the award, retirement, trade, and registration of compliance premiums shall follow the requirements of subsections (d), (k) and (m) of this section.
- (3) A compliance premium may be used by any entity toward its RPS requirement pursuant to subsection (h) of this section.
- (4) The program administrator shall increase the statewide RPS requirement calculated for each compliance period pursuant to subsection (h)(1) of this section by the number of compliance premiums retired during the previous compliance period.

### XII. Locating Green Power Products

The GPP Web site hosts the Green Power Locator, a national and state-by-state listing of available green power products: <http://www.epa.gov/greenpower/pubs/gplocator.htm>.

EPA does not endorse any provider or product listed in this database.

## EPA's Green Power Partnership: Partnership Requirements

### XIII. "New" Renewables Purchase Requirement

To support developing more renewable energy capacity nationwide, EPA requires that Partners meet their minimum green power purchase requirements from "new" renewable energy facilities. EPA defines "new" as those facilities put into service on or after January 1, 1997. This date is generally considered to be the inception of the voluntary green power market.<sup>3</sup>

EPA considers facilities put into service before January 1, 1997 to be "existing" generation facilities. Facilities placed into operation before January 1, 1997 may qualify as a "new" facility if one or more of the following conditions are met:

1. The facility has been re-powered on or after January 1, 1997 such that 80 percent of the fair market value of the project stems from new generation equipment installed as part of the re-powering.
2. A separable improvement to or a complete improvement of an existing operating facility provides incremental generation that is separately metered from the existing generation at the facility. In addition, if the incremental generation is sold as a green power market product, then it must be contractually available for sale and not claimed under a state renewable portfolio standard or consent decree.
3. The facility is a biomass co-firing operation that meets the eligibility requirements as described in Appendices A and B and began co-firing eligible biomass with non-eligible fuels on or after January 1, 1997.
4. The facility is a separately metered landfill gas resource that was not used to generate electricity before January 1, 1997.

Purchases of existing renewables or onsite use of existing renewables will be phased out of the Partnership under the following approach:

1. All Partners' purchase contracts for existing renewables or onsite use of existing renewables which have been reported to EPA as of February 19, 2009 will continue to be recognized by the Partnership for the duration of the contract or up to a period not to extend past January 1, 2012.

*Example: Partner C has just entered the second year of a three-year purchase agreement that is 20 percent new renewables and 80 percent existing renewables. The Partnership will recognize the full purchase amount for the full three-year term of the contract. The Partnership will not recognize existing renewables in any extension of the contract.*

2. Current and new Partners may enter into new contracts for existing renewables under the present program requirements through June 30, 2009. However, any existing renewables purchased or generated onsite by current or new Partners under this condition will be recognized by the Partnership for no more than one 12 month period.

*Example: Partner D purchases 10 million kWh of existing renewables per year in a three-year agreement that is executed on March 1, 2009. The Partnership will recognize the 10 million kWh purchase only until March 1, 2010. The Partnership will not recognize the second and third years' purchase.*

### XIV. Green Power Vintage Requirement

The green power (kilowatt-hours) produced by renewable generators is identified by the "vintage" year in which electricity is generated (i.e. electrons delivered to the utility grid).

For example, the RECs associated with the renewable generation of electricity by a wind facility during the 2007 calendar year are considered to be 2007 vintage RECs.

For Partners' yearly purchase, EPA requires that Partners buy green power products generated within that vintage year, up to six months prior to that vintage year or up to three months after the vintage year.

#### Important Note:

Organizations should be aware that emissions inventory protocols might require that green power purchase vintages align with the specific year for which the emissions reduction is claimed; for example, a 2007 emissions reduction being achieved through a green power purchase would require that the green power be generated between January 1 and December 31, 2007. Organizations should verify that a green power purchase is applicable towards meeting greenhouse gas reduction goals. For information on carrying out an emissions inventory, please refer to EPA's Climate Leaders partnership at <http://www.epa.gov/climateleaders>.

For example, a Partner purchasing green power for eligibility in the Green Power Partnership in 2007 may select qualifying green power generated at any point between July 2006 (six months prior to the current calendar year) through calendar year 2007 and up through March 2008 (three months after the vintage year).

The Green Power Partnership can only recognize green power

<sup>3</sup> Exceptions may be made, on a case-by-case basis, for facilities placed online prior to 1997 that were developed specifically for utility green pricing programs.

## EPA's Green Power Partnership: Partnership Requirements

purchases made subsequent to an organization submitting a partnership agreement.

### Future RECs

Future RECs are counted in the year they are actually generated, with the same limited flexibility offered to any other REC product. This means they may be claimed to meet Partnership requirements if they are generated in the current year, in the last six months of the prior year, or the first three months of the following year.

*Example: In 2009, Partner E purchases a future REC product from a wind farm that is scheduled to begin operation in 2012. The RECs generated by this wind farm will not be eligible to meet Partnership requirements until operations begin and the projected REC generation is realized.*

All Partners purchasing future RECs as of February 19, 2009, may continue to count future RECs against their current year Partnership commitments for the duration of their existing contracts or until January 1, 2011, whichever comes first.

No later than January 1, 2011, regardless of existing contracts, all future REC purchases in the program must be counted only in the year generated, with the same flexibility exceptions around the current year.

After February 19, 2009, new purchases of future RECs may be counted only in the year generated, with the flexibility exceptions noted above.

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## XV. Product Certification

EPA strongly encourages Partners to buy green power products that are certified by an independent third-party as a matter of best practice. Buying a certified green power product offers a higher certainty to customers that they are receiving the desired environmental benefits. Certified products also meet environmental and consumer protection guidelines adopted by the certifying organization as well as relevant guidelines set forth by the National Association of Attorneys General and the Federal Trade Commission.

EPA does not require Partners to buy certified products.

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## XVI. Environmental Claims Guidance

Buying or using green power enables Partners to make certain environmental benefit statements. Partner organizations should consider the following guidelines when calculating and 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.
3. **Make claims that match the scope of your purchase.** If you are buying green power for a subset of your organization, you should communicate the scope of your purchase when making your claims.
4. **Retain ownership of RECs for onsite green power.** If you own an onsite renewable electricity generation source, you should avoid selling the associated RECs of the onsite source if you wish to make an environmental claim. Selling the RECs transfers your claim on the renewable attributes of the system to the buyer of the RECs.
5. **Retire the RECs associated with your green power purchase.** Your organization should retire the RECs associated with its green power purchase. Organizations should not transfer or sell RECs after a claim has been made. Making a claim constitutes a retirement of the REC; any sale or claim by a different owner would constitute a double claim. In taking these steps, you help avoid two different parties claiming the same green power benefits.
6. **Support your claims by buying certified or verified green power products.** If your organization is buying green power, especially RECs, you should consider specifying products that are independently certified and verified by a third-party. Certification can provide credibility and confirmation of the product's environmental value. Verification is based on an audit—independent of the provider—that confirms that you get what was promised, both in quality and in quantity. Audits ensure that no one else is making a claim on the same environmental benefits.
7. **Limit claims to indirect emissions.** Your organization should be careful when making claims of emissions reductions. If you are buying renewable electricity or RECs, you are reducing your indirect emissions. Indirect emissions are those resulting from electricity generation that an

## EPA's Green Power Partnership: Partnership Requirements

organization buys from an electricity service provider. An organization buying green power can claim to be reducing its carbon footprint, but may not claim to be reducing its total emissions to the atmosphere through a green power purchase alone.

**8. Avoid claiming emissions reductions not included in your purchase.** In emissions markets regulated by cap and trade programs, such as with nitrogen oxides (NO<sub>x</sub>) and sulfur oxides (SO<sub>x</sub>), your organization can claim an emission reduction only if it buys and retires emission allowances. These allowances may be as part of, or separate from, buying RECs.

**9. Use the terms “REC” and “offset” correctly in your claims.** The term “offsets” has various definitions among greenhouse gas registries and programs. Often, RECs are not the same as offsets. In voluntary markets, offsets are emissions reductions that are achieved through projects that cause verifiable emissions reductions outside the scope of an organization's direct or indirect emissions. In regulated cap and trade programs, offsets can have a specific legal meaning as a noun. Describe your purchase as avoiding emissions, such as “This purchase of RECs avoids \_\_\_ tons of carbon dioxide (CO<sub>2</sub>).”

**10. Use Emissions & Generation Resources Integrated Database (eGRID) utility sub region non-baseload emissions rates when calculating carbon equivalencies resulting from a green power purchase.** eGRID is a comprehensive inventory of environmental attributes of electric power systems. The preeminent source of air emission data for the electric power sector, eGRID is based on available plant-specific data for all U.S. electricity generating plants that provide power to the electric grid and report data to the U.S. government. eGRID contains air emission data for NO<sub>x</sub>, sulfur dioxide, CO<sub>2</sub>, and mercury. For assistance using this data, please contact your EPA account manager. For additional information please see <http://epa.gov/cleanenergy/energy-resources/egrid/index.html>

**11. Follow Federal Trade Commission and National Association of Attorneys General green marketing guidance.** These guides apply to environmental claims included in labeling, advertising, promotional materials, and all other forms of marketing, whether asserted directly or implied

through words, symbols, emblems, logos, depictions, product brand names, or through any other means, including marketing through digital or electronic means, such as the Internet or electronic mail. The guides apply to any claim about the environmental attributes of a product, package, or service in connection with the sale, offering for sale, or marketing of such product, package, or service for personal, family, or household use, or for commercial, institutional, or industrial use. For added information please see <http://www.ftc.gov/bcp/grnrule/guides980427.htm> or [http://www.eere.energy.gov/greenpower/buying/pdfs/naag\\_0100.pdf](http://www.eere.energy.gov/greenpower/buying/pdfs/naag_0100.pdf)

### How to Calculate Environmental Benefit Statements

To standardize and assist organizations in calculating environmental benefits, the GPP has developed the Green Power Equivalency Calculator (<http://www.epa.gov/greenpower/pubs/calculator.htm>). The equivalency calculator uses eGRID<sup>4</sup> non-baseload national average and subregion emissions rates.<sup>5</sup> Organizations should use the Green Power Equivalency Calculator to estimate the avoided emissions of a green power purchase. Partner organizations can use EPA's Power Profiler to estimate the emissions associated with their conventional power use. Power Profiler uses an eGRID baseload emissions factors.

Partners buying green power generated from landfill gas or wastewater treatment methane may claim the indirect greenhouse gas emissions reductions from displacing conventional electricity. Organizations should not claim greenhouse gas emission reductions from the direct capture and destruction of methane; such claims are not often conveyed through the associated RECs or green power purchase.

## XVII. Partner Recognition

### Green Power Partner Mark

Partners may use the EPA Green Power Partner mark within the limits described in the Partner Mark Use Guidelines. Partners may use the mark on Web sites, press releases, and general marketing materials to show the organization's partnership with EPA. EPA is available to review all uses of the Partner mark on Partner communication materials.



<sup>4</sup> eGRID is the Emissions & Generation Resource Integrated Database maintained by the U.S. Environmental Protection Agency that records average annual emission rates (lbs./MWh) by power plant. The database can be used to show average emission rates by utility, state, region and nationally. It can be found at <http://www.epa.gov/cleanenergy/egrid/index.htm>

<sup>5</sup> This would apply to claims of carbon reduction benefits that are not regulated by a cap and trade program. Note that claims about SO<sub>2</sub> emissions reduction may not be made by renewable energy generators unless they have acquired and subsequently retire SO<sub>2</sub> emission allowances under the Acid Rain Program. Similarly, providers and Partners must be very careful about making claims for NO<sub>x</sub> emission reductions, which are capped in some states and vary by time of year.

# EPA's Green Power Partnership: Partnership Requirements

The Partner Mark Use Guidelines outline how Partners should use the Partner mark in promoting their partnership with EPA. In all cases, please notify EPA when using the Partner mark. The document is available at [http://www.epa.gov/greenpower/documents/gpp\\_guidedoc\\_mark.pdf](http://www.epa.gov/greenpower/documents/gpp_guidedoc_mark.pdf).

For added information about using the Green Power Partner mark, please contact Allison Bellins ([bellins.allison@epa.gov](mailto:bellins.allison@epa.gov)).

## National Top Partner Lists

Partners can earn placement on one or more of EPA's Top Partner lists. EPA updates these lists quarterly. The update schedule and Partner data deadlines are available on the Partnership Web site at <http://www.epa.gov/greenpower/toplists/>.

Placement on EPA's Top Partner Lists provides excellent opportunities for Partners to announce new or increased green power purchases. EPA's Top Partner lists currently include:

- National Top 50 List
- Fortune 500 List
- Top 20 Retail List
- Top 20 College & University List
- Top 10 Federal Government List
- Top 20 Local Government List
- 100% Purchasers List

EPA reserves the right to retire or modify existing lists—or to introduce new Top Partner lists—at any time.

## Green Power Leadership Awards

The annual Green Power Leadership Awards recognize organizations and individuals that significantly advance the development of green power resources and markets. The award nomination period begins in the spring. Nominations are reviewed by EPA and an independent panel of judges. The awards ceremony is held in the fall at the National Renewable Energy Markets Conference. EPA recognizes winners in the following categories:

- Onsite Generation
- Green Power Purchasing (any product type less onsite)
- Partner of the Year

Winners must be EPA Green Power Partners in good standing. For more details, visit the Awards page of the GPP Web site at <http://www.epa.gov/greenpower/awards/index.htm>.

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## XVIII. Partner Suspensions

EPA requires that Partners update their partnership and green power purchase status annually. Each year, EPA will provide a Partner Yearly Report to each Partner's primary contact on record. Failure to respond to or meet the Partnership's minimum requirements will result in the Partner's suspension from the program. EPA will attempt to contact non-responsive Partners by e-mail before beginning the suspension process. Suspension entails removal of the Partner from all GPP materials, including the Web site. Suspended Partners must remove all mention of partnership from their marketing materials and Web sites, including all uses of the Green Power Partner mark.

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## XIX. Partnership Requirements Updates

EPA will continue to monitor the green power market and propose revisions to Partnership requirements as necessary. Requirements subject to review include, but are not limited to, minimum purchase requirements, GPLC purchase requirements, "new" renewables requirements, vintage requirements, and eligibility of renewable resources. EPA will provide Partners and stakeholders with the opportunity to review and comment on any significant updates or proposed changes to the Partnership requirements.

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## XX. Contact EPA's Green Power Partnership

For questions about the GPP, please contact:

Blaine Collison ([collison.blaine@epa.gov](mailto:collison.blaine@epa.gov) or 202-343-9139)

Allison Bellins ([bellins.allison@epa.gov](mailto:bellins.allison@epa.gov) or 202-343-9526)

# EPA Green Power Partnership: Partnership Requirements

## Appendix A – Eligible Green Power Resources

The following is a detailed list of eligible renewable resources that meet EPA's green power criteria:

1. Solar photovoltaics
2. Wind
3. Geothermal
4. Hydropower from new generation capacity on a non-impoundment or new generation capacity on an existing impoundment that meets one or more of the following conditions
  - a. Hydropower facilities certified by the Low Impact Hydropower Institute
  - b. Run-of-the-river hydropower facilities equal to or less than 5 megawatts nameplate capacity
  - c. Hydropower facilities that consist of a turbine in a pipeline or a turbine in an irrigation canal

EPA will consider new incremental capacity on an existing dam on a case-by-case basis, where the “new” output is equal to or less than 5 megawatts.

EPA will honor green power contracts in place before April 30, 2006 from hydropower installations of less than 30-megawatt capacity until those contracts expire.

EPA will review and consider ocean-based or tidal generation resources as warranted by technological, implementation and market developments.
5. Biomass, i.e., solid, liquid, and gaseous forms from the following fuels:
  - a. All woody waste<sup>4</sup>
  - b. All agricultural crops or waste
  - c. All animal and other organic waste

- d. All energy crops
- e. Landfill gas and wastewater methane
- f. Municipal solid waste, which is eligible if it meets EPA requirements for co-firing of biomass with non-renewables (see Appendix B).

Biomass resources excluded from eligibility include:

- a. Wood that has been coated with paints, plastics, or formica
- b. Wood that has been treated for preservation with materials containing halogens, chlorine or halide compounds like CCA-treated materials, or arsenic. (CCA = chromated copper arsenate)

Qualified wood fuels may contain de minimis quantities (i.e., less than 1 percent of total wood fuel) of the above excluded contaminants.

6. Biodiesel (B100) that is used to generate electricity is eligible if the following conditions are met:
  - a. The biodiesel is separately measured (and verified) from the petroleum diesel, and
  - b. Contracts are in place to allow a third party to verify that the biodiesel was converted to electricity.

Only the amount of electricity generated from the biodiesel may be counted as an eligible renewable resource.
7. Fuel cells are eligible when powered by hydrogen derived from any of the eligible renewable resources identified above.

<sup>4</sup> Includes “black liquor” from pulp and paper processing, mill residues, industrial waste wood, and waste wood from woodworking or wood processing, so long as the wood is not chemically treated or coated.

### Appendix B – Co-firing of Eligible Biomass

1. Co-firing of eligible forms of biomass with non-renewables is permitted if at least one of the following conditions is met:
  - a. The facility is located in an electric system control area that makes use of a generation tracking system (e.g., NEGIS, PJM-GATS, WREGIS) that is fully capable of accurately measuring and reporting the differentiated (i.e., biomass-fired and non-biomass-fired) electrical output from the facility; or,
  - b. The biomass is in a gaseous or liquid state, is separately metered and there are contracts in place to verify that the biomass portion was converted to electricity; or,

Facilities that do not meet either of the criteria above may be eligible subject to a case-by-case review by EPA. The methodology presented to EPA must demonstrate that the Btu value of the electrical output from the facility is attributed to the eligible biomass fuel. Some of the criteria that EPA will consider in making its decision are:

- a. Whether the facility was modified to accept biomass fuel.
- b. Whether an independent entity is involved in verifying or determining the appropriate measurement.
- c. Whether there is a way to determine and ensure that the net electricity increment being sold as or considered “renewable” can be attributed to eligible biomass fuel. EPA would prefer a verification methodology that can be applied universally.

Only the amount of electricity generated from the eligible biomass may count towards the EPA criteria.

# Partnership Agreement



**T**he EPA Green Power Partnership encourages the voluntary use of green power to reduce the risk of climate change. Partners benefit from the use of green power, while supporting the development of new, renewable energy in the United States.

With this agreement,  joins EPA's Green Power Partnership and commits to:  
(Name of organization or entity)

- Buy green power that meets or exceeds Partnership requirements within six months of signing this Partnership Agreement.
- Report on green power purchasing activities annually.
- Use the Green Power Partner mark in a manner that is consistent with Partner mark use guidelines, available at [www.epa.gov/greenpower/partner\\_corner](http://www.epa.gov/greenpower/partner_corner).

**In return, EPA commits to:**

- Provide public recognition.
- Provide procurement and communications assistance, as requested by Partner.
- Provide a brief description of the Partner's green power commitment on the Green Power Partnership Web site.

**General Terms:**

- Either party can terminate this agreement at any time without prior notification or penalties and with no further obligation. EPA will not comment publicly regarding the withdrawal of Partners.
- Partner agrees that the activities it undertakes connected with this voluntary agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
- Partner agrees that it will not claim or imply that its participation in the Green Power Partnership constitutes EPA approval or endorsement of anything other than its participation in the program and will not make statements or imply that EPA endorses the purchase or sale of the Partner's products and services or the views of the Partner's organization.
- EPA may post information about the Partner's purchase publicly, but will honor all requests to keep the Partner's purchasing data and/or electricity use confidential.
- EPA may use the Partner's logo in selected marketing materials. This added benefit is available only to Partners that have joined the Green Power Partnership and have completed a green power purchase for all their U.S. facilities.
- EPA may periodically revise program benchmark levels or other eligibility requirements.

**Authorizing Official:**

On behalf of , the undersigned understands and agrees to the terms of the Green Power Partnership.  
(Name of organization or entity)

Signature: \_\_\_\_\_

Title:

Print Name:

Date:

**Primary Contact:**

Name:

Title:

Address:

City:  State:  Zip:

Phone:  Fax:

E-mail:

**Public Relations Contact (optional):**

Name:

Title:

Address:

City:  State:  Zip:

Phone:  Fax:

E-mail:

**PLEASE FAX THE PARTNERSHIP AGREEMENT TO 202/343-2208**



## Partner Information

- Partner's electricity use:  kWh / year
- Partner's green power commitment:  kWh / year
- Partner Web page on green power use:
- Completed green power purchase?  Yes  No

### If yes, please provide the following information:

- Contract details effective date:  term:  years
- Green power products  renewable electricity product  RECs  on-site generation
- Green power resource mix  % solar  % wind  % geothermal  % biomass  
 % biogas  % hydro (small or low-impact)
- Product certification/verification  Yes  No If yes, by whom?
- Green power retailer(s) or provider(s)
- If we have additional questions, may we contact your provider(s) for additional information?  Yes  No

## Key Partnership Requirements

### Green Power Purchase Requirements

<b>Your Organization's Baseload</b> If your annual electricity use in kilowatt-hours is...	<b>Green Power Partner Requirements</b> You must, at a minimum, purchase this much green power within one year of joining the Partnership	<b>Green Power Leadership Club Requirements</b> You must, at a minimum, purchase this much green power
≥ 100,000,001 kWh	2% of your use	20% of your use
10,000,001 - 100,000,000 kWh	3% of your use	30% of your use
1,000,001 - 10,000,000 kWh	6% of your use	60% of your use
≤ 1,000,000 kWh	10% of your use	Not Applicable

- Partners must acquire electricity generated from eligible renewable resources, which include solar, wind, geothermal, biogas, eligible biomass, and eligible hydropower.
- Partner commitment can be met with any combination of green power products (i.e., green power, RECs, or on-site generation).
- Partner purchases must be voluntary and incremental to the renewable electricity included in the standard electricity service.
- Minimum Partner and Leadership Club purchase requirements must be entirely met with power from "new" renewable facilities (i.e., installed after 1/1/1997).

More details are available in the Program Requirements Memo, [http://www.epa.gov/greenpower/documents/gpp\\_partnership\\_reqs.pdf](http://www.epa.gov/greenpower/documents/gpp_partnership_reqs.pdf)

The government estimates the average time needed to fill out this form is 4.9 hours and welcomes suggestions for reducing this level of effort. Send comments (referencing OMB control number) to the Director, Collection Strategies Division, U.S. EPA (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460.

**PLEASE FAX THE PARTNERSHIP AGREEMENT TO 202/343-2208**



# Partner Yearly Report

**Email or fax the corrected Yearly Report to:**

Blaine Collison

Phone: (202) 343-9139

Email: collison.blaine@epa.gov

Fax: (202) 343-2208

The Green Power Partnership asks Partners to provide information annually on green power usage as it relates to program commitments. Please update your organization's information below. If possible, use the **"track changes"** feature found on the Tools menu in MS Word. Send the revised Partner Yearly Report to your account manager identified above. **Please contact your account manager with any questions.**

## Green Power Partner Name

	Our Organizational Liaison	Our Public Relations Liaison
Name:		
Title:		
Address:		
City/State/Zip:		
Ph:		
Fax:		
Email:		

## Commitment Details

Partnership Agreement Date (i.e. date that we joined partnership):	
Yearly Report Date (i.e. today's date):	
Our Total Annual Electricity Consumption:*	
Our Annual Green Power Commitment:	
Our Green Power Commitment as a % of our total electricity consumption:	
Our minimum commitment level for the Green Power Partnership based on our organization's size:	
Our green power product's % of "new" renewables (as a % of the total green power purchase):	

\*Note: 1 MWh = 1,000 kWh

## Purchase Details:

Our Green Power Retailer(s) is:	
Our Green Power Product name (if applicable) is:	
Our Green Power Product is certified by a 3 <sup>rd</sup> party?	
Delivered electricity product (green pricing program)	
Delivered electricity product (green marketing program)	
Renewable energy credits (tags, green certificates)	
On-site generation (e.g. photovoltaics on our facilities)	

## Green Power Product Source Information

Our Green Power Product includes the following mix of renewable resources:

Solar		Biogas	
Wind		Biomass	
Geothermal		Hydro	



# Partner Snapshot

**Email or fax the completed Snapshot to:**

- Account Manager
- Phone
- Email
- Fax

The Green Power Partnership is updating the list of all Green Power Partners on its website at [www.epa.gov/greenpower](http://www.epa.gov/greenpower).

All Green Power Partners have the opportunity to have a Partner Snapshot on the website. The Partner Snapshot is a short paragraph that describes briefly a Partner's organization, its decision to purchase green power, and its experience to date with green power.

If you would like to create a new (or revise your existing) Partner Snapshot, please answer the Partner Snapshot Interview Questions below.

### Current Snapshot for Your Organization (if applicable):

Snapshot:	
Organization's Website:	
Organization's Green Power Related Web site (e.g. environmental page or press release about purchase):	

### Partner Snapshot Interview Questions

If you would like to create a new (or revise your existing) Partner Snapshot, please answer the Partner Snapshot Interview Questions below. Your answers will be used to develop a Snapshot paragraph, which you will be able to approve prior to its addition to the website. Please add any additional information relevant to your purchase.

1. Please provide a brief description of your organization (e.g., 25 words or less).
2. What is your organization's green power commitment?
3. What was the driver behind your organization's commitment?
4. Any lessons learned during your green power commitment process you would like to share with others?
5. What are the biggest benefits that have accrued to your organization since your commitment?
6. Can you provide a quote from about the benefits of green power for your organization? (For example, a quote from senior decision maker at your organization.)