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Submission via email: comments@green-e.org

Subject: BCSE Submission in response to the draft Green-e® Renewable Fuels Standard for Canada and the United States

The [Business Council for Sustainable Energy](#) (BCSE) is pleased to submit the following comments on the draft Green-e® Renewable Fuels Standard for Canada and the United States.

Founded in 1992, the Council is a coalition of energy efficiency, natural gas and renewable energy companies and associations. Its membership includes investor-owned and public utilities, independent power producers, manufacturers, technology providers, energy services companies, and sector-specific trade organizations.

BCSE is pleased to have an independent small business division under its banner, the Clean Energy Business Network (CEBN). Together, BCSE and CEBN represent a broad range of the clean energy economy, from Fortune 100 companies to small businesses working in all 50 states. Together, these industries support over 3 million U.S. jobs.

BCSE members have a strong understanding of the key policy, regulatory and market drivers that are necessary to help deploy technology. Market transparency is a critical component. Many BCSE members have experience with Green-e standards and certification programs and seek to serve as a resource as a standard is being developed for renewable fuels in North America.

Further, several BCSE members are directly engaged in Renewable Natural Gas (RNG) markets – as producers, as end users, and as utilities that seek to offer RNG to customers. ***As such, a number of these companies and associations intend to submit their own comments to CRS on this draft standard, including: the American Biogas Council, the American Gas Association, the American Public Gas Association, the Coalition for Renewable Natural Gas, and Gas Technology Institute, among others.***

The Council appreciates the work that CRS has done to advance the draft standard and wishes to express its recognition of the value of Green-e standards and certification programs overall, as a benchmark of environmental quality. Through this submission, the Council offers comments on a number of areas related to the draft standard. BCSE also encourages review of its April 30, 2020 submission to CRS. This submission provided data on the important and growing role that renewable fuels can play in achieving sustainability and greenhouse gas emission reduction goals, especially in buildings and industrial applications. Please see: https://bcse.org/images/2020_CACC/BCSE_Submission_to_CRS_on_the_Green-e_RFS_4_30_20_Final.pdf

BCSE looks forward to finalization and release of this Standard to certify renewable fuel production, sales and consumption. As CRS intends, an appropriately structured Green-e standard will demonstrate environmental integrity to customers, increase awareness of renewable thermal resources and expand deployment and use of RNG.

BCSE offers the following comments on the draft standard:

Allow All Customer Classes to Be Eligible under the Standard

- CRS is considering limiting the standard to include only large commercial and industrial customers. BCSE believes the standard should allow residential and small commercial customers to participate also. Restricting participation of customer classes severely limits the benefits to the environment that this standard could provide. As well, excluding residential and small commercial customers could limit utilities from participating, as these could be their primary customer base. BCSE urges CRS to include all residential, commercial, and industrial customers as eligible participants, to ensure the broadest possible environmental benefits of the Standard.

Ensure Maximum Participation and Do Not Establish Minimum Monthly Purchase Requirements

- The renewable gas market for thermal applications is still early in the development phase. Both production and demand are just starting to expand. Imposing a minimum monthly purchase requirement would impose an arbitrary barrier to participation and limit market growth. BCSE urges CRS not to include a minimum purchase requirement in the Standard.

Maintain the Focus of the Standard on the Certification of the Environmental Integrity of RNG, Do Not Include Out of Scope Disclosures

The survey requests feedback on whether residential and small commercial customers should receive disclosures about electrification and/or efficiency options prior to signing up for a utility RNG program. BCSE does not believe that such disclosures are within scope of the Standard.

- RNG and other technology and resource options to reduce emissions from the building sector are complementary and all available strategies will be needed to achieve decarbonization goals. While it is important for customers to understand how greenhouse gas reductions are achieved through various methods, including electrification and energy efficiency, the current Standard is primarily designed to certify the sustainability of RNG products and to grow the market for RNG. Therefore, BCSE views disclosures related to other technology options as outside the scope of the Standard.

Include All Feedstocks in the Standard

The survey requests feedback on whether certain feedstocks should be included in the Standard. BCSE believes that all feedstocks should be included in the Standard upon its release to enable broad participation and RNG market expansion. This includes the inclusion of municipal waste water, woody biomass, energy crops and animal waste.

- BCSE members urge eligibility of all feedstocks within this standard. It has been suggested that instead of limiting certain feedstocks, the Standard should rely on robust greenhouse gas lifecycle accounting as a primary screen to eliminate problematic feedstocks.

Carbon Intensity Metric under the Standard Should Recognize RNG with a Score Below that for Fossil Natural Gas

- The Standard should require that eligible RNG possess a carbon intensity (CI) score that is lower than that of conventional natural gas. This is because any RNG with a CI score lower than that of conventional natural gas provides greenhouse gas benefits.

Closing

The Business Council for Sustainable Energy appreciates the opportunity to provide comments on the draft *Green-e Renewable Fuels Standard for Canada and the United States*. Please contact bcse@bcse.org for any questions related to this submission.