RE100
CLIMATE GROUP | CDP

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Results of public consultation on proposed changes to the RE100 technical criteria

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Introduction

The RE100 technical criteria may be revised periodically to recognize shifts in markets, new and credible sourcing options for renewable electricity, and to ensure that the criteria support RE100's mission as a leadership initiative dedicated to accelerating the change towards carbon-free grids by 2040. The technical criteria are reviewed and updated on a two-year cycle for any major changes. The next scheduled revision, which this document covers, is to be completed by the end of 2022.

In February 2022, RE100 held town hall meetings with RE100 members where position papers on three proposed changes to the technical criteria were discussed. RE100 took the feedback gathered from members in the town hall meetings and revised these position papers.

RE100 then launched a public consultation around the position papers, which closed on 27 May 2022. The proposals were then updated based on member feedback, input from the Technical Advisory Group, external stakeholder engagement, research from the RE100 technical team, and finally presented to the RE100 Project Board (RE100's ultimate decision-making body)[1] in August for approval.

This document presents the final forms of each proposed change and **confirms their adoption into or withdrawal from the RE100 technical criteria.** RE100 has also included a summary of the feedback received in the public consultation, with RE100's comments on it.

Please review the new RE100 technical criteria to review the changes more completely, and to understand their entry into force (including grandfathering).

Original proposed changes and public consultation

A public consultation was held on three proposed changes to the RE100 technical criteria from 30 March 2022 until 27 May 2022. Some feedback was received beyond 27 May and has also been considered.

The original proposed changes to the RE100 technical criteria for consultation were:

1. Redefining the single market for renewable electricity in Europe recognized by RE100 to countries which are AIB members.
2. Accepting physical cross-market procurement of renewable electricity under certain conditions.
3. Introducing a fifteen-year commissioning date limit on the facilities which RE100 members may claim purchased (not self-generated) renewable electricity from.

These changes, and their expected impacts, are described in more detail in the original consultation document[2].

[1] https://www.there100.org/re100-governance

[2] https://www.there100.org/sites/re100/files/2022-04/20200330_Open%20consultation%20on%20RE100%20technical%20criteria%20changes.pdf

1. A revised single market for renewable electricity in Europe

Summary of resultant decision

RE100 will **adopt a modified version** of the proposal shared in the public consultation. CDP will also adopt this change in its own guidance.

Countries in Europe which meet **all** the following conditions are considered to form a single market for renewable electricity:

- The country is in the EU single market;
- The country is a member of the Association of Issuing Bodies (AIB) – issuing European Energy Certificate System (EECS) Guarantees of Origin; and
- The country has a grid connection to another country meeting the first two rules.

Exceptions have been made for countries or areas which have little domestic energy production and import much of their electricity (including renewable electricity attributes) from neighboring countries which meet the above rules. The exempted countries or areas include the Channel Islands, Andorra, Liechtenstein, Monaco, San Marino, and Vatican City. Here, corporate buyers should procure using EECS Guarantees of Origin and **cancel them ex-domain**[3].

The list of countries or areas which currently meet these rules is:

• Austria	• Luxembourg
• Belgium	• Netherlands
• Croatia	• Norway
• Czech Republic	• Portugal
• Denmark	• Slovakia
• Estonia	• Slovenia
• Finland	• Spain
• France	• Sweden
• Germany	• Switzerland
• Greece	• The Channel Islands[4]
• Hungary	• Andorra[4]
• Ireland	• Liechtenstein[4]
• Italy	• Monaco[4]
• Latvia	• San Marino[4]
• Lithuania	• Vatican City[4]

[3] https://www.aib-net.org/facts/market-information/statistics/ex-domain-cancellations

[4] These countries or areas are included in RE100's view of the single market for electricity in Europe as exemptions because they have little domestic energy production and import much of their energy (including renewable electricity attributes) from bordering countries meeting the conditions described above.

The following countries listed in RE100's note on market boundaries from 27 May 2019 are now distinct markets for renewable electricity:

Country	Reason for exclusion
• Bulgaria	Bulgaria is not an AIB member
• Cyprus	Cyprus is not grid-connected to the single market for renewable electricity in Europe recognized by RE100
• Malta	Malta is not an AIB member
• Poland	Poland is not an AIB member
• Romania	Romania is not an AIB member
• Serbia	Serbia is not in the EU single market
• The United Kingdom	The United Kingdom is not in the EU single market and is not an AIB member

Impact

For RE100 members following the current CDP market boundary, the impact is minimal with only Serbia, Iceland, and Cyprus now individual markets for electricity. For RE100 members that have been observing RE100's European market boundary the change could be significant.

Based on reporting from RE100 members reporting to CDP in 2022, at least 604 GWh of procurement of renewable electricity from 46 RE100 members operating in 24 European countries does not meet the new market boundary definition. These contracts would remain recognized by RE100 as appropriately grandfathered until their expiry after the grandfathering date (see below).

Transition plan

Contracts with operational commencement dates before 1 January 2024 may observe the definitions of market boundaries adopted by RE100 in its note on market boundaries published 27 May 2019 (which includes the countries excluded above) or by CDP in its scope 2 technical note published 3 April 2020 (which states that countries which are AIB members form a single market for electricity).

Contracts with operational commencement dates on or after 1 January 2024 must observe the updated market boundary definition.

2. Physical procurement of renewable electricity across a market boundary

Summary of resultant decision

The proposed change is **withdrawn** from this RE100 technical criteria update.

RE100's first conclusion was that the proposal was widely misunderstood by RE100 member companies and other stakeholders. Many interpreted the proposal as the introduction of a flexibility mechanism to be used in markets with unavailable or expensive renewables. This would risk undermining existing understanding of market boundaries for the marginal benefit of recognizing procurement that is not yet possible anywhere. The technical criteria describe procurement mechanisms that RE100 recognizes today. The currently recognized mechanisms are also all currently possible. RE100's governance and advisors thought that recognizing a new mechanism that was not yet possible would create confusion for companies.

RE100's second (and more important) conclusion was that, on a balance, it would not be helpful for RE100 to be prescribing or incentivizing particular actions at this stage and in this context. On the contrary, this could potentially limit the development of these vitally important contracts and their associated projects.

RE100 wishes to be clear that for it to recognize physical cross-market procurement there will need to be conditions, i.e., physical cross-border transmission, consistent accounting of energy attributes in the markets of origin and destination, and mutually recognized instruments and contracts. Deliberations revealed that RE100 is not currently able to prescribe the detailed mechanisms for meeting these conditions.

RE100 initially proposed to recognize physical cross-market procurement because it believes (and continues to believe) that broader integration of markets is a core part of RE100's goal of carbon-free grids by 2040. RE100 will clarify the issue of physical cross-market procurement on the RE100 website (perhaps in a blog or in the RE100 FAQs) and make it clear that it will continue to be studied by RE100 and will potentially be recognized in a future version of the technical criteria.

Impact

No current procurement by RE100 members will be affected.

3. A commissioning date limit on renewable electricity purchases

Summary of resultant decision

The proposed change is **adopted with clarifications** based on feedback in the consultation and recommendations from the RE100 TAG:

The RE100 technical criteria will require procurement of renewable electricity to either observe a fifteen-year commissioning or re-powering date limit, or be described by one of the below:

- Self-generation
- Physical power purchase agreements with on-site projects or off-site projects to which there is a direct line with no grid transfers
- Long-term project-specific contracts the corporate buyer has entered into **as the original off-taker from the project(s),** and extensions of those contracts, **even if they exceed fifteen years in length,** including:
    - Physical power purchase agreements with off-site grid-connected projects
    - Financial power purchase agreements
    - Project-specific contracts with electricity suppliers
    - Project-specific contracts for unbundled EACs
- Claims to default delivered renewable electricity
- Grandfathered contracts with operational commencement dates before **1 January 2024**

The revised RE100 technical criteria will include redefined procurement types with revised guidance, to which these bullet points refer more comprehensively.

RE100 members may exempt procurement of renewable electricity up to a threshold of 15% of their total electricity consumption from the requirements above.

In other words, if a corporate buyer is only procuring 15% renewable electricity, no procurement is subject to the above requirements. A corporate buyer procuring 50% renewable electricity may exempt 15% (in terms of its total consumption) and must subject the remainder of its procurement of renewable electricity (35% of its total consumption) to the above requirements. A corporate buyer procuring 100% renewable electricity may exempt 15% of its procurement and must subject the remainder of its procurement of renewable electricity (85% of its total consumption) to the above requirements.

RE100 thinks this change is necessary for the initiative to effectively use corporate demand for renewable electricity to drive change on the grid at the necessary pace. RE100's ambition for corporate buyers to accelerate the transition towards carbon-free grids by 2040 cannot be met without corporate buyers themselves contributing to renewable electricity capacity additions. The RE100 technical criteria and RE100 members' adherence to them send a powerful signal to markets and policymakers. The point of the campaign, and the RE100 technical criteria, is not to be an accounting standard and reporting platform but rather to be an instrument of change.

Impact

No current contracts would be impacted because they would all continue to be eligible as grandfathered supply arrangements. New contracts entered into on or after 1 January 2024 must observe the rules above. Contracts with old projects eligible for renewal on or after 1 January 2024 only include project-specific contracts members entered into as original off-takers. This describes classes of physical PPAs, financial PPAs, contracts with suppliers, and contracts for unbundled EACs.

Self-generation, procurement through direct lines (on-site or off-site with no grid transfers), and passive claims are exempt from a fifteen-year commissioning or re-powering date limit.

A comprehensive impact assessment for this change based on existing reporting data to RE100 is not possible because reporting does not currently capture project-specificity, or where RE100 members are original off-takers.

In reporting to CDP in 2022, at least 81 RE100 members, operating in 90 countries or areas, procure around 19 TWh of renewable electricity annually from projects commissioned more than fifteen years ago. Unless these contracts are eligible for renewal as project-specific ones where the member is the original off-taker, they would no longer be recognized after their expiry on or after 1 January 2024, or would only be recognized as part of the 15% threshold RE100 has specified for procurement from old projects.

Across 179 TWh of purchasing of renewable electricity reported in 2022, commissioning date information was disclosed for 78 TWh. Some members procure Green-e ® certified renewable electricity without disclosing a commissioning date. Green-e ® renewable electricity only comes from projects commissioned or re-powered in the past fifteen years. Accounting for this implicit commissioning date, **RE100 members purchased a minimum of 85 TWh of renewable electricity from projects commissioned or re-powered in the last fifteen years in their reporting in 2022, equivalent to half their purchasing.**

Transition plan

Contracts with operational commencement dates before 1 January 2024 may disregard a commissioning or re-powering date limit. All new or renewed contracts with operational commencement dates on or after 1 January 2024 must observe the new rule.

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Summary of feedback

Responder type	Responses	AIB membership for the European market boundary		Accepting physical cross-market procurement		Fifteen-year commissioning date limit		
		In favour	Opposed	In favour	Opposed	In favour	Opposed entirely	Opposed on basis that long-term contracts should be recognized or grandfathering should be provided
RE100 member	**24**	**13**	**5**	**14**	**4**	**6**	**8**	**9**
Consultant	**4**	**2**	**2**	**2**	**1**	**1**	**2**	**1**
RE100 member/consultant	**1**	**0**	**1**	**1**	**0**	**0**	**1**	**0**
Supplier/utility	**7**	**2**	**0**	**1**	**2**	**1**	**3**	**2**
EAC system designer/operator	**2**	**0**	**0**	**2**	**0**	**2**	**0**	**0**
Trade association	**1**	**1**	**0**	**1**	**0**	**0**	**0**	**0**
Total	**39**	**13**	**5**	**14**	**4**	**6**	**17**	**12**

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Below we will provide RE100 responses in red to the feedback we received in the consultation. Consultation responses have been condensed and consolidated where possible. Most of the responses included are from participants that disagreed or provided qualified agreement.

1. Making AIB membership the market boundary for Europe

- Narrows the markets and will lead to higher prices (and thus less RE generation). Instead, RE100 should allow corporates to offtake green power anywhere on the planet and match it against consumption anywhere in the world.
    - One global market for renewable electricity will not lead to carbon-free grids by 2040 but rather a race to the bottom for the cheapest, lowest-impact procurement.
- Agree on the importance of aligning CDP and RE100 criteria and the importance of EECS certificates, but believe this would be harmful to RE100's core objective of accelerating the transition to carbon free grids by 2040, RE100 should encourage immediate meaningful action and in markets with limited procurement options companies may not take alternative action
    - RE100 believes that companies themselves are key to driving the energy transition in the markets in which they are physically buying and consuming electricity. Allowing any alternative will lead to no change in challenging markets, and therefore no progress towards carbon-free grids.
- Europe is one interconnected electricity grid and electricity flows between countries irrespective of AIB membership and thus we should encourage RE development in Europe in the places where it makes most financial and environmental sense
    - We generally agree with this comment, but for this to be credible across national borders there must be, among other things, a robust certificate system allowing the transfer of the attributes across borders. In Europe, that system is EECS.
- Other EU countries that follow same quality criteria as AIB could be included if documentation is provided.
    - If they are following AIB criteria, they should be AIB members. We want the burden of reviewing that documentation to be on AIB, not on RE100 or RE100 members.
- This concerns us for sourcing in Romania and Bulgaria
    - This change may disrupt procurement in these countries, yes. Based on reporting in 2021, RE100 member companies operating in Romania purchased around 240 GWh of renewable electricity, almost all of which was both generated outside of Romania and sourced as purchases of unbundled EACs. In Bulgaria, members purchased around 40 GWh of renewable electricity, more than half of which was generated in Bulgaria and sourced through green electricity products. The remaining purchases, from generation outside of Bulgaria, were unbundled EACs.
    - **In both Bulgaria and Romania, in-country procurement options exist.**
    - **In both Bulgaria and Romania, no high-impact, long-term procurement arrangements from generation located outside of those countries is reported.**
- We already follow CDP guidance so this doesn't impact us, but we encourage extending grandfathering provisions and providing guidance on local RE tariffs
    - A grandfathering clause has been provided. RE100 cannot provide country-level guidance on local tariffs.

- RE100 boundary should be countries that are AIB members and include countries that are part of the EU single market, to reflect the physical energy market
    - The market boundary as written now reflects countries that are both AIB members (providing the credible certificate system and tracking across borders) and grid connected EU single market members (providing the shared regulatory framework and to some extent grid connections).
- Concerned that small countries now excluded from EU market boundary may not be able to operationalize EAC systems
    - For countries with their own electricity supply, they will need to develop an EAC system if they do not already have one. For microstates with little or no electricity generation and contained within the boundaries of the EU, an exemption has been provided.
- Agree with the decision to narrow the market boundary but this doesn't go far enough. The boundary should be the grid region or balancing authority where consumption occurs, which in Europe would be individual countries and for North America should be the balancing authorities or regional transmission organizations. This would incentivize sourcing RE closer to actual electricity consumption and ensure more effective decarbonizing of a company's actual footprint
    - We agree with this. Renewable electricity procurement must more closely match physical flows of electricity to reduce the environmental impacts resultant from companies' use of electricity. We expect that in the medium-term EAC markets will move in the direction of closer location and time-matching to reflect actual transmission and generation constraints. This view has also been reflected in a recent report by ENTSO-E, the European Network of Transmission system operators. Markets have not yet broadly moved in this direction.
- We support changes that make things easier to understand and this complicates sourcing and reporting. There are not enough RECs being generated in some non- AIB countries to meet our RE goals.
    - This guidance is clearer than previously by being entirely principle-based. By considering three pillars (shared regulation, shared accounting, and physical grid interconnectedness) for defining a single market for renewable electricity, the definition is clearer in Europe, and now reflects principles which can be applied globally.
- Most companies procure AIB RECs and the flow of revenue away from non-AIB members pushes them to join, this change disincentivizes some markets to join AIB.
    - Reporting to RE100 indicates that, outside of AIB, most procurement is in-country, and is not AIB GOs being cancelled ex-domain. We see evidence that non-AIB members are under great pressure to join AIB and expect that some of them will join soon.
- We agree but there should be an option to reach 100% now
    - We disagree. RE100 is about grid transformation in every market. Companies cannot reach 100% until they are able to buy RE in every market they operate. Corporate claims should not outpace actual opening of RE markets.
- For some of the very small markets (Monaco) there is probably no generation taking place and excluding them from EU market introduces unnecessary complexity
    - We agree and have exempted countries and areas like Monaco which import energy and energy attributes from countries which meet the conditions for inclusion in the single market. This exemption does, however, introduce potential future complications as we review markets in other areas of the world. Market boundaries must be principle-based in a way that can be applied globally.
- We prioritize impact in our sourcing and sign long term contracts from the same power grid as our operations. In countries where we have small operations this leaves us with no impactful procurement path. Some countries that would be excluded (Poland) have high carbon intensity grids and this encourages procurement from cleaner markets rather than dirtier ones. This is at odds with procuring from location with more emissions

abatement impact. We recommend the boundary be all European countries that participate in power market trading.

    - We support long-term contracts from the same grid (although throughout the consultation parties are using the language “the same grid” to mean different things). In-country sourcing is possible in Poland and Bulgaria. In 2021, only one RE100 member reported sourcing renewable electricity generated in Poland for operations outside of Poland. The sourcing was a green electricity product and we do not know if it was a long-term contract. No members reported sourcing renewable electricity generated in Romania for their operations outside of Romania. We have reflected the actual market for power trading in the market boundary but also require that the certificates, the data layer supporting the attribute transactions, can be transferred from market to market.

- The market should be countries that are AIB members implementing EECS rules and or EU/EEA/EFTA/Energy Community members. The market boundary must recognize both the importance of the legal role of the European single market as well as the importance of EECS rules.

    - We agree. We believe that both are required, not either/or. The adopted definition requires both.

2. Accepting physical cross-market procurement when certain conditions are met

- We support this as a last resort but are concerned it could be abused and result in claims with limited real-world impact. This could lead to basic EACs used at the expense of higher grade (and higher cost) local EACs. If done this should have a hierarchy where EACs must be used if available.
    - These criteria are very strict to prevent to prevent this option from being abused. If a project meets these criteria, we think that it is credible. We note however that there has been significant misunderstanding of what this change intends to allow.
- This is a positive development for PPAs
- We encourage RE100 to maintain its current approach to 100% claims, allowing purchases outside of the market if companies are transparent about it and name it in external communications.
    - Please see this document for RE100's approach to recognizing claims which do not meet the RE100 criteria.
- This change discriminates against small and medium sized enterprises, if this is allowed out of market unbundled EACs should be also. This undermines the principle of in-country sourcing.
    - This does not discriminate against small and medium sized enterprises. We are aware the barriers to entry of this method are likely too high for SMEs right now. They are however necessary to ensure that this procurement option does not undermine the principles of in-country sources and does not provide a procurement pathway that undermines domestic markets.
- This may only succeed in some markets as compliance with the criteria are impossible in some markets. This should be given a tiered approach.
    - At present RE100 does not believe procurement meeting these criteria to be possible anywhere at all. This is not intended as a relaxing of the principles of market boundaries but rather to recognize that in the future there could be credible contracts across borders even when the two markets cannot be consider as wholly joined.
- Will take time for projects to be built and for all these rules to be met which might not allow us to meet our 2025 target.
    - This is not a "right now" solution to difficult markets. It is not intended to be. It is intended to recognize credible procurement if/when it exists.
- Agreed with the proposal and limiting it to PPAs but think residual mix requirement should be removed as residual mix is not required for in market transactions and think that transmission requirement should be edited to require contractual transmission rights capable of transmitting the claimed volume of electricity as it is difficult to verify physical cross border transmission.
    - A number of parties have commented on the residual mix. We are aware that it is a high bar but think that is necessary in the absence of a truly interconnected REC registry and emission and accounting standards between the two markets. We are open to reviewing this topic further in the future.
- We support strict market boundary requirements but in the case where in market purchasing is not possible we do not advocate for requiring a physical energy connection between points of EAC issuance and cancellation. If RE100 does want to keep transmission as a requirement they should link it to transport capacity and not physical flows, which cannot be proven. An interconnection between markets should be sufficient to allow cross market EAC trade.
    - We think that physical interconnection is necessary for any cross-border transaction, but that interconnection alone between markets does not mean that they are joined. We agree that the language on transmission capacity is important and think transmission can be "proven" by capacity rights. We are open to reviewing this topic further in the future.

- We think that the residual mix requirement will impede implementation and recommend its removal. It is a great aspirational target but will be a problem in Asia due to lack of residual mix calculations by government and grid operations and limited expectations that they will begin in the coming years. Additionally, several Asian countries made up of many islands and separate grids have drastically different residual mix and emissions factors between subregions of the country. Due to this national calculation may not be useful.
    - We are open to reviewing this topic further in the future.
- Change should be implemented immediately and GHG protocol and CDP guidance should be updated accordingly.
    - GHG Protocol will make the decision if they would recognize this explicitly or not. If this proposal is implemented, it would be updated in CDP guidance as well. We must reiterate that we don't think this procurement method is currently possible anywhere.
- Change should be implemented and unbundled EACs should also be allowed when there all of the following are met 1) no domestic supply option 2) there is government and support sourcing options abroad 3) there are physical transmission lines between the countries (or they are planned)
    - We disagree. We think anywhere there are physical, regulatory, legal, and accounting barriers that define a market, renewables must be developed in that market. This change is designed to allow claims in the case where specific transactions overcome those barriers and should not be used as an alternative to overcoming them.
- We support physical cross market procurement when certain condition are met but believe the proposal as written is limiting and doesn't provide feasible procurement options. The residual mix requirement will be challenging and is not required for in market purchase. We encourage RE100 to open a consultation on acceptable alternative actions when in market sourcing is not possible. Out of reach standards can limit ambition. Recommend clarifying if VPPAs are acceptable and including long term EAC agreements.
    - The proposal is not intended to provide procurement options where there are not credible options, but rather recognize a new type of credible procurement. We are open to reviewing this the residual mix requirement further in the future.
- We oppose this because it will lead to increased costs of green power and thus less green power generation. Allow companies to match offtake of green power anywhere on the planet with consumption at any location where it is consumed.
    - Unclear how this would lead to increased costs and how increased costs would lead to less generation. Global matching of RE is not credible or impactful.
- Disagree, we support cross market procurement when there is interconnection between two countries and find the proposed criteria too restrictive. Suggest electricity be capable of being physically transmitted cross market and residual mix requirement be removed as RE100 is not an emission tracking system but an RE claims leadership program.
    - Existence of a physical interconnection is only one of the requirements to consider a market as joined. There are limited amounts of interconnection between many markets and that alone does not mean that a purchase in one market creates change in the neighboring market.
- We do not support this, cross market procurement should remain prohibited. This will discourage RE development in challenging markets and potential lead to double counting issues and greenwashing.
    - We think that the criteria are sufficiently strict as to prevent greenwashing and double counting. Again we support development of RE in ALL electricity markets and want to ensure that any cross border transaction that we recognize can feasibly be changing the actual grid mix in the country of destination.

- Agree, this is crucial for development of markets in SEA. A G2G agreement between the countries stating that RE is not accounted for within market of origin can replace the need for residual mix, but only if the project is on a dedicated grid.
    - We are open to reviewing this the residual mix requirement further in the future.
- We support this but are unaware of any markets that meet these requirements. In what markets does RE100 see these contract structures emerging?
    - We are not aware of any markets that meet these requirements either. This was written with the current tender for physical import of RE into Singapore in mind. We are aware of similar discussion in West Africa and in other Southeast Asian markets.

3. Introducing a fifteen-year commissioning date limit on the facilities which RE100 members may claim purchased (not self-generated) renewable electricity from

- There were many comments asking for exemptions for PPAs longer than 15 years.
    - This has been done. PPAs longer than 15 years from new generation will be exempted, as will original off-takers signing PPA extensions.
- There were many comments asking for a clause on repowering.
    - This has been done. Current language allows for plants that have been repowered via updates to efficiency or output costing 80% of the fair market value of the plant. In the case of hydro only additional output is recognized and under strict conditions. Appendix C in the technical criteria contains the full language.
- Recommend exempting plants where financial support keep the project in operation
    - This is too difficult to prove to make it a part of the criteria.
- This will limit options in some markets, like the USA where more than a third of RE capacity comes from hydropower. This change will effectively take hydro off the market. Governments subsidize new renewables but not old ones.
    - The 15 year commissioning date limit is already a part of the EPA's Green Power Partnership and a requirement for Green-E certification. Additionally, some state RPS programs do not recognize older hydro generation. This has not led to generators going offline as a number of the comments claim will happen if this rule is implemented.
- Agree, we recognize that this may limit procurement options in some markets short term but creates an important market signal for new generation.
- Disagree, we purchase from green utility programs across Europe and obtaining project COD information will be difficult at best given that there is no standard reporting implemented across Europe on this topic. Tracking down this information will drain team resources from developing renewables in aa more meaningful way. Data will also be difficult from supplier purchased electricity and co-located spaces. If RE100 insists on this rule we suggest that there be a percentage threshold ~85%.
    - We agree initially getting data on this will be a burden. We want the burden to go from the consumer to the supplier and how that this rule will drive more transparency from utilities. When you are buying RE from a supplier via a green utility program part of what the utility is selling in a data layer and a guarantee that the energy is renewable. The obligation must be on them to back that up with transparent data. Given that this data is not currently provided we have provided both a 2 year ramp up where we will ask for the data to be reported but not discount anything and also a 15% exemption which can be used where data cannot be obtained (as well as for other reasons).
- Yes, strongly support, matches better with our internal criteria and creates a real impact driven initiative. Our only concern is that other members dilute the requirement, and it loses the real world benefit.
    - Thank you. We are trying to balance provide reasonable accommodation with exemption that don't limit real world impact while also trying to keep the complexity of the requirement as low as possible while providing those exemptions.
- A rating system for claims should be implemented instead, similar to financial credit ranking (D, C, A, A+, A++). This would create a low threshold to help get companies to take the first steps in RE and allow them to show improvement over time while also giving credit to RE leaders.
    - We considered a ranking or points system but think that this is important enough that it should be part of the criteria. The mission of RE100 is not the creation of accounting systems or solely allocation existing renewables to customers but rather change to the grid.

- Add impact points instead of a limit or awards for companies that source from new generation.
    - We considered a ranking or points system but think that this is important enough that it should be part of the criteria.
- Artificially reduced supply of EACs will drive up prices.
    - Yes we recognize that short term this will constrain supply and could lead to price increases. It will also be a driver for new RE and faster project development which should increase supply.
- The role of RE100 is as a mean of reporting on RE procurement and this is a shift from being a reporting tool to a measure of impactful procurement. If the purpose of RE100 is changing that should be communicated.
    - RE100 is a leadership campaign, not a means of reporting on RE procurement.
- This rule needs more nuance, once a grid reaches a larger proportion of renewables it doesn't makes sense that commissioning dates need to be in the last 15 years.
    - Our intention currently is that the 15% exemption could be used, among other things, for grids that have a high % of renewables. We also have an existing threshold for highly renewables markets in our criteria. It would not make sense to exempt highly renewables markets, like Norway, that export RE to other markets in Europe.
- We agree that new RE is needed but current sources must also be maintained and this would cause damage to suppliers that cannot scale up generation and ruin current buyer procurement plans.
    - We do not agree that this will drive significant amounts of existing RE generation offline.
- We oppose any change that would drive up prices, we should be able to use EACs from anywhere in the globe.
    - A global EAC market would not drive RE development in a meaningful way.
- Agree in concept but don't agree with a strict black and white rule, make it % based.
    - A threshold for sourcing which may ignore a commissioning or re-powering date limit has been included.
- We recommend an even shorter commissioning date limit from existing projects.
    - We have kept it 15 years for all contracts that are not with new generation.
- We support the intent, raising the bar for additionality to ensure that RE100 commitment are effectively driving new RE projects and the further decarbonization of the grid, but have concern about the impact in markets with limited EAC supply such as Singapore. We suggest limiting this requirement to mature markets with sufficient EAC supply.
    - We are hesitant to make any market specific criteria. RE100 has members operating in over 150 electricity markets and country specific criteria would quickly become unworkable. Beyond this, markets with limited renewable electricity capacity are exactly those markets where new renewable electricity capacity must be built.
- Korea currently has very limited RE supply (6.5%) and most of existing RE is under long term RPS contracts.
    - Markets with limited supplies of RE will make it difficult for companies to comply with this rule while achieving their targets. The goal of RE100 however is carbon free grids by 2040, which requires significant buildout of new RE in Korea, and almost every other market.

- Disagree, commissioning date is an indicator of additionality, but more wind/solar parks are a burden on nature/environment and upgrading old equipment is more sustainable. This rule might have a detrimental impact on the liquidity of the EAC market. Post subsidy plants, such as in Germany, can be a source of short term PPAs and should be allowed.
    - We need both new generation and repowering of old assets, not one or the other. Upgrading of old equipment is not sufficient on its own to transform the grid. Germany has a target for 80% of its generation mix to be renewable by 2030, which requires ~20 GW of renewable capacity additions per year. We recognize that there may be some current procurement types, such as the short term PPAs from post-EEG assets in Germany, that will be affected by this rule. However, the financial viability of these plants was a concern and topic of media attention well before RE100 considered this change. Our understanding is that few farms were actually scrapped and the German BMWi (Federal Ministry for Economic Affairs and Energy), when reviewing support schemes for these post-EEG generators in 2021, said that with a return to 5 cents/kWh (which markets have long since exceeded) these plants would be competitive in the market.
- This creates an artificial supply imbalance that in theory leads to more development but current market conditions don't support this. Projects are sold years in advance with CODs of 2024-2025 now. This would limit options for SMEs and favor larger consumers. This would tip the scales towards a small club of larger sophisticated buyers instead of getting more companies to buy RE.
    - The challenges in the pipeline already exist in many markets and we don't think that this exacerbates them but rather that the increased demand can be part of the moment, which we see prominently in Europe right now, to remove permitting barriers. Yes, this will initially be easier for large companies but the success of the transition to RE depends on impactful procurement becoming more available to SMEs and those impactful procurement solutions need to be tied to new generation.
- This is not possible in Japan as supplies of RE are limited in Japan and most of what exists is old hydro. RE costs have not dropped in Japan like in Europe, North America, or China. This won't encourage RE development in Japan but will drive consumers to purchase out of market.
    - The transition to more renewable grids requires more renewables to be built. Japan currently has ~10% RE in their grid and has a target of 36-38% by 2030 which requires significant new RE to be built in the short term. We agree that maintaining existing RE plants is also important but think that can be accomplished by other market mechanisms, especially when existing plants are generally already paid off. There is no credible out of market procurement that we would accept.
- Different COD limits should apply to different generation types due to differing service life.
    - We have chosen 15 years as a reasonable average across markets and technology types.
- If RE100 moves more towards the use of additional impact criteria some market participants may see it as more of an energy label than a reporting mechanism akin to CDP.
    - RE100 is a leadership campaign, with a reporting mechanism via CDP reporting. RE100 exists to drive grid change via corporate demand.
- We support this in principle and believe it will help drive new generation. We have noted that it will lead to an approximate 25% decrease in available IRECs.
    - Thank you, noted.
- New powerplants do not always mean more RE is being generated as they may be displacing old ones that cannot be monetized. Japan has geographical limits to building new RE.
    - More RE must be built despite constraints and purchases of RE must drive new RE generation either directly or indirectly. If existing plants with paid off capital costs can't survive in the market, then the market needs to be changed. Please see the 6 RE100 global policy measures here.

- We agree in principle but suggest this not go into place until 2025 to inform our subsidiaries and utilities.
    - Please see the plan for entry into force detailed in the new technical criteria document. All current supply arrangements will continue to be recognized and will be eligible for renewal if they meet the detailed exemption criteria on or after 1 January 2024.
- At first glance, the idea is good and fuels renewables funding. At a second look, and keeping in mind the corporate interest of securing long-term supply, this interest is reduced with the proposed change, as the premium compared to spot markets will be significantly increased by narrowing the portfolio to choose from increasingly with the planned tenure of the hedge. Suggest a standardized assessment on environmental impacts of assets, not this.
    - We do recognize that this will narrow the supply short term but believe that it will drive faster update of new renewables. An assessment of environmental impact of assets should also always be done.
- Disagree, it is important to maintain existing power sources as well as develop new. Some projects require a longer capital payback period which must be taken into account, suggest at least 20 years.
    - See exemptions for longer term contracts with new generation. We agree that existing power sources must also be maintained and don't believe that this will displace them.
- Support as it will bring greater credibility to the RE100 initiative and the impact its member have, but some flexibility is required for markets that don't have credible sourcing options such as Serbia and Switzerland where there are limited non-hydro options. In other markets our loads are too small for PPAs and thus we need to buy from existing generation. We support onsite renewables, which we believe deliver direct additionality, versus spending a significant extra cost on EACs. Suggest a 25% exemption or excluding certain countries (ex. Switzerland)
    - The intent is to provide flexibility via the 15% exemption. It should be noted that while we do support a local procurement approach even within Europe, a company also has the option to buy from other countries in the European market.
- We support the aim of the proposal but question discounting all older RE, we think this may deter companies from joining RE100 and prefer a carrot to a stick approach. We suggest a % threshold or special recognition for members that do this.
    - We have provided a 15% exemption to this on top of exemptions for long term contracts with new generation and exemptions for existing contracts.
- Proposal should be withdrawn or at least exclude large hydro. Markets are regulating themselves and if demand for RE grow prices will rise and thus RE development will be accelerated. What are the alternatives to hydro in China, Brazil, India, Norway and Sweden, all of which have large amounts of hydro?
    - We don't see a justification to exclude large hydro. To our knowledge every country listed, in addition to having large amounts of renewables, also has new renewables under development or targets for more renewable generation.
- This suggests older generators are less 'renewable' than newer ones.
    - It does not. The intent of the rule is to increase RE100's members' demand for renewable electricity from new generators, which is central to RE100's aim to accelerate the transition to low-carbon grids. While RE100 members' demand from renewable electricity from old generators will decrease, RE100 expects that the voluntary, and in some cases compliance markets, as well as the physical electricity market, will continue to have demand from these resources. This change also sends an important signal to stakeholders in nascent RE markets that there is differentiated demand within the renewables markets and that creation of an RE or EAC market primarily to market existing assets does not satisfy corporate demand.

- This eliminates older hydro generation, which is an important resource for a 100% renewable grid.
    - Dispatchable renewables such as hydro generation are indeed important resources for a 100% renewable grid. However, voluntary procurement from it does not directly advance the energy transition. Older hydro will continue to operate, and its unique value as a dispatchable renewable resource will continue to be compensated through other market mechanisms.
- This eliminates older hydro generation, which is an important part of a 24/7 procurement approach.
    - A 24/7 procurement approach and a fifteen-year commissioning or re-powering date limit are not irreconcilable. For the 24/7 procurement approach to drive the desired change in the grid its price signals must incentivize development of new technologies and resources which enable the integration of ever-increasing amounts of renewables into the grid. Regardless, RE100 has specified a 15% threshold for procurement (on the basis of total electricity consumption) which may ignore a commissioning or re-powering date limit.