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RE100.org

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

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Introduction

RE100 commits to reviewing the RE100 technical criteria every two years. This process allows the campaign to recognize shifts in markets, new and credible renewable electricity (RE) procurement, and to ensure that the criteria support RE100's mission. RE100 last made changes to the RE100 technical criteria in 2022.

RE100 consulted on four proposals for the criteria in 2024. They are summarized in position papers used to launch a public consultation that took place over April-May 2024.

Feedback received in the public consultation was considered by RE100 and its Technical Advisory Group (TAG) over June – October 2024.

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 on the RE100 guidance page.

Original proposed changes and public consultation

A public consultation was held on four proposed changes to the RE100 technical criteria from April 2024 until 27 May 2024. Some feedback was received beyond 27 May and has also been considered.

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

- Criteria on co-firing or mixing of renewable and non-renewable fuels
- Requiring energy attribute certificates (EACs) for all RE purchasing from the grid in markets where EACs are available
- Inviting proposals for better ways to define the original off-taker exemption to the facility age limit
- Inviting proposals to change Section Four of the technical criteria

These changes, and their expected impacts, are described in more detail in the original consultation document available on the RE100 guidance page.

Criteria on co-firing or mixing of renewable and non-renewable fuels

Resultant decision

RE100 will **adopt a modified version** of Proposal A from its consultation materials and **exclude all RE that is generated by co-firing with coal** from the RE100 technical criteria. Rather than introducing this rule in the 2025 CDP disclosure cycle, RE100 will introduce it in the 2027 CDP disclosure cycle.

Adherence to this rule will be studied by requesting new disclosure of any co-fired fossil fuels for all RE generated from a renewable fuel.

Evidence received by RE100 in the consultation indicated it is reasonable to expect companies to seek this additional information and prepare to disclose it in 2027. Some EAC registries track whether thermal RE generators co-fire their renewable fuels with any fossil fuels and have the capacity to forward this information onto EACs themselves.

The scope of the rule is expanded from its original proposed form. All RE generated by co-firing with coal will be excluded from the technical criteria, rather than only RE purchased through grid PPAs, contracts with suppliers, and unbundled EACs. RE100 believes it is appropriate to include RE self-generation and RE purchasing from non-grid sources in the scope of the rule, as well as passive claims. *Default delivered renewable electricity […] supported by EACs* (procurement type 5.1) requires data about the EACs retired, which companies can use to exclude any RE generated by co-firing with coal. *Default delivered renewable electricity […] no mechanism for specifically allocating renewable electricity* (procurement type 5.2) is only relevant in markets that already generate no electricity from coal.

RE100 cannot currently define criteria for co-firing or mixing of renewable fuels with other fossil fuels either in the direct electricity generation stage or in the value chain of the renewable fuel without potentially creating unintended consequences for growth in renewable fuels. Instead, RE100 will additionally include **recommendations** for companies to consider when making RE claims derived from renewable fuels that are co-fired with a non-coal fossil fuel, or may be partially renewable (i.e. hydrogen or ammonia that stores a mix of renewable and non-renewable energy).

Impact and implementation

At least 4, and (very conservatively) up to 9 TWh of RE was procured by RE100 companies in their 2023 reporting (out of over 230 TWh of total RE procurement).

This RE was procured through the following procurement types and tracked in the following ways:

RE procurement type	Maximum possible RE procurement from biomass (GWh)
Unbundled EACs	4,503
Contract with supplier (retail)	3,770
Physical PPA	429
Self-generation	334
Contract with supplier (project-specific)	32
Virtual PPA	31
Unclear	1

Tracking system	Maximum possible RE procurement from biomass (GWh)
GO	2,921
Contract (i.e. not tracked by an EAC)	1,303
US-REC	1,015
REGO	1,011
NFC	993
I-REC	916
Unclear	514
J-Credit	55
GEC	33
LGC	3
T-REC	1
Korean national EAC system	0.1

RE100 expects that all project-specific arrangements held by RE100 companies (i.e. the 492 GWh of PPAs and project-specific contracts with suppliers) can immediately establish whether any RE was generated as a product of co-firing with coal. 13 companies reported generating their own RE from biomass in 2023, and most left comments indicating their biomass RE generation was from biogas (which would be unlikely to be co-fired with coal). Unbundled EAC purchasing can establish whether any RE was generated as a product of co-firing with coal either by researching the generator the certificate was issued to or asking the intermediary (i.e. consultant or broker) that sourced the certificate. For retail contracts with suppliers, the electricity supplier must provide the information to the RE100 company.

The majority of the 9 TWh is tracked with EACs, which is reasonable grounds to expect the information can be obtained easily. For the 1.3 TWh of purchasing that did not cite an EAC, 752 GWh uses a retail contract with supplier procurement type, which may be the most difficult type of RE purchasing for which to obtain this information. RE100 companies purchasing RE generated from biomass through retail contracts with suppliers that do not certify the supplies with EACs should begin requesting more information from their suppliers about this RE immediately.

In the 2027 CDP disclosure cycle, RE100 companies must establish whether the thermal generator from which RE was generated or procured co-fired, and disclose details of that co-firing. **Where companies fail to identify if the underlying generator co-fired and what was co-fired, RE100 will not recognize the RE claim from a renewable fuel.**

Requiring energy attribute certificates (EACs) for all RE purchasing from the grid in markets where EACs are available

Resultant decision

RE100 will **adopt a modified version** of the proposal to require EACs to track all RE purchasing from the grid in markets where EACs are available. Evidence received in the consultation revealed no instances where RE purchasing tracked contractually could not reasonably be expected to start issuing the RE with EACs.

Two changes to the rule are made from its proposed form:

- Rather than introducing the rule in the 2025 CDP disclosure cycle, RE100 will introduce it in the 2027 CDP disclosure cycle.
- The criterion for which markets qualify for the rule is refined. A market qualifies for the rule once an EAC system is in common use there. An EAC system is in common use once CDP disclosure data (from all companies, not only RE100 companies) show that at least ten companies make RE claims in a market using the system, and also have their market-based scope 2 emissions assured to at least the limited level. In these markets, RE100 companies may prefer to use the EAC system(s) shown to be in common use, but are not required to choose a specific system for their procurement if more than one exists. The list of markets that qualify under these criteria will grow over time as EACs become more widely adopted, and the technical criteria include details of how changes to the list will be managed over time.

RE claims supported by EAC cancellation offer the highest level of assurance of claim credibility. Moreover, EACs are critical tools for a functioning voluntary renewable energy market and for enabling accurate energy-related emissions accounting. EACs:

- Enable unique and exclusive claims in a transparent and verifiable manner;
- Track energy attributes and make information available efficiently, facilitating consumer choice in energy procurement;
- Greatly improve the accuracy and ease the calculation of a residual mix, which is essential to market-based scope 2 emissions reporting.

While contracts for RE where EACs do not exist could be used to make RE claims; the credibility of these claims is largely understood only be the company making the claim and the third-party verifier tasked with verifying the claim. RE100 has concerns about the quality of (and for some cases, total absence of) third-party verification of their claims.

EACs directly facilitate compliance with the fifteen-year facility age limit (at least, where the EAC system tracks this information). Furthermore, they are the subject of one of the six RE100 Global Policy Messages[1].

Impact

Up to 18% of the procurement reported by RE100 members in the 2023 disclosure cycle was not backed by EACs. Following further engagement with RE100 members, RE100 believes that this is mostly due to incorrect reporting of claims that were in fact supported by EAC cancellation.

RE100 wishes to clarify that the rule only results in a change to claims made through grid PPAs and contracts with suppliers. All other procurement types (self-generation, unbundled EAC purchases, and passive claim options) either already use EACs in their definition or are exempt from the rule.

The new rule means that grid PPAs and contracts with suppliers must supply RE from generators that receive EACs that are redeemed, retired or cancelled by **or on behalf of** RE100 companies. The new rule **does not** require RE100 companies to establish their own registry accounts to cancel EACs. Likewise, portfolio cancellation approaches remain valid (portfolio EAC cancellation refers to many EACs being retired on behalf of many users, without individual EACs allocated to individual users, and is common practice among EAC brokers and energy suppliers).

Where RE100 companies are unsure if their PPA or contract with supplier delivers RE that is issued with EACs, they must ask their contracting party for information relevant to their reporting to RE100, including, but not limited to, the name of the EAC system. If the RE is not issued with EACs, this rule requires the contracting parties to begin issuing EACs to the RE.

RE100 has included a list of markets in which the rule will apply in the new technical criteria. As EACs become more widely adopted, the list of markets will change over time. The new technical criteria include the details of how changes to the list will be managed over time.

[1] https://www.there100.org/policy-engagement

A call for evidence to relax the original off-taker exemption to the facility age limit

Resultant decision

RE100 will include more guidance for the original off-taker exemption to the facility age limit in the technical criteria.

Evidence received in the consultation revealed a multitude of scenarios where corporate buyers are not able to be original off-takers in the strictest sense of the term that RE100 has deferred to since defining the exemption in 2022. In some markets, regulation imposes a mandatory test period on a project or there is an administrative delay before a corporate off-taker can enter into a long-term contract with it. With this change RE100 intends to recognize the original off-taker in cases where the delay is caused by regulation. **RE100 does not believe any unavoidable delays between commissioning and off-take last more than twelve months, and will not consider RE100 companies to be original off-takers if their off-take agreements begin more than twelve months after commissioning.**

Impact

It is not possible to understand the impact of this change since RE100 has not yet studied RE100 companies' use of the original off-taker exemption to the fifteen-year facility age limit. However, improved guidance should provide greater certainty for developers seeking financing and for off-takers in their contract negotiations.

Inviting proposals to change Section Four of the technical criteria

Resultant decision

RE100 **will not** introduce any changes to Section Four.

RE100 will instead start collecting a new, optional disclosure of **supply agreement length** for RE purchasing.

Feedback received in the consultation did not suggest RE100 should consider new ways to classify RE procurement. However, much of the feedback identified supply agreement length as essential context for RE procurement. Long-term contracting is already an element of what RE100 considers 'impactful procurement' as described in Section Five of the technical criteria (alongside project-specificity and young facility age). However, RE100 has no way of directly studying supply agreement length beyond implicit assumptions that power purchase agreements and project-specific contracts with suppliers tend to use longer agreement lengths than retail contracts with suppliers and unbundled EAC purchases. It is clear some companies purchase unbundled EACs on long agreement lengths, however, and RE100 believes it would be valuable to start explicitly collecting this information.

This is not a change to the technical criteria: RE100 is setting no rules on the lengths of contracts RE100 companies must use. It is a decision to introduce a new, optional datapoint in disclosure that some RE100 companies may wish to use to provide further context for their claims.

Impact

No change to the technical criteria. However, new data will be collected that could potentially allow RE100 to develop additional impact metrics for RE100 member progress tables.

The new datapoint is expected to be available to disclose on in the 2026 CDP disclosure cycle.

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Criteria on co-firing or mixing of renewable and non-renewable fuels

Feedback and RE100 comments

Feedback type	RE100 member company	Consultant or service provider	Supplier or utility	Special interest group	Civil society/NGO	Government or regulator	Other corporate	Total
General support	17	11	1	3	3	0	1	36
General opposition	8	2	3	2	0	2	1	18
No view	1	0	1	0	0	0	0	2

- 36/56 respondents generally supported co-firing/mixing rules. Most support from RE100 companies was on the basis that they already bought no RE from biomass. 17/56 respondents submitted detailed feedback to support their views.
- Government/regulator, supplier/utility, and special interest group respondent types had strong opposition.
- The most common concern across opposed perspectives was the proposed rules could have unintended consequences for growth in renewable fuels supply, especially for Proposal B where co-firing or mixing with any fossil fuel would be prohibited by RE100.
- Many organizations' opposition simply voiced support for the status quo of recognizing the renewable fraction of the electricity generated by any facility that co-fires.
    - This feedback fails to address any concerns raised in the consultation.
- Four organizations (two RE100 companies, two suppliers/utilities) voicing general opposition indicated they would instead support a coal co-firing ban.
- One RE100 company indicated compliance with the rule was difficult to achieve in instances where they receive a managed supply of RE (for example, from a landlord).
    - While RE100 acknowledges compliance with this rule is more difficult for certain procurement scenarios, the initiative believes the issue is important enough to make a rule around it. Furthermore, the compliance challenge for managed supplies of RE is not fundamentally different from the challenges introduced by the 2022 facility age limit: RE100 companies must already engage with supply managers to understand the commissioning dates of the facilities supplying RE.
- Four organizations supported minimum co-firing % rules.
    - Unfortunately, RE100 does not feel prepared to prescribe specific thresholds. In some markets, these thresholds may be very restrictive, while in others, they may undermine existing practices.
- One organization argued that natural gas co-firing does not pose a fossil fuel lock-in problem since natural gas facilities require little or no capital investment to co-fire renewable fuels in comparison with coal plants.

    - While it may be true less investment is needed to co-fire biogas in a gas power plant compared to modifying a coal plant to co-fire biomass, the argument that this equates to no fossil fuel lock-in risk is unclear.

- Many organizations viewed the re-powering definition change proposal as radical. Organizations argued complete conversions are not so common, and co-firing at shares that reduces emissions requires significant investment that should be acknowledged by RE100.

Requiring energy attribute certificates (EACs) for all RE purchasing from the grid in markets where EACs are available

Feedback and RE100 comments

Feedback type	RE100 member company	Consultant or service provider	Supplier or utility	Special interest group	Civil society/NGO	Government or regulator	Other corporate	Total
General support	11	13	4	4	3	0	2	37
General opposition	15	0	0	0	0	2	0	17
No view	0	0	1	1	0	0	0	2

- 37/56 respondents generally favoured RE100 requiring EACs for all RE purchasing from the grid in markets with EAC registries. There was universal support for the proposal among suppliers or utilities and consultants or service providers. The strongest opposition came from RE100 companies.
- Many opposed respondents were concerned the proposed rule would increase the cost of RE procurement.
- Many opposed respondents presented the following practical concerns about how to comply with the rule:
    - ‘Managed supplies’ of RE – i.e. ones provided by a landlord or datacenter operator – would present greater compliance challenges. Respondents asserted supply managers would be unable or unwilling to share more information about the supplies of RE they manage (i.e. whether EACs were cancelled).
        - RE100 does not believe the challenges for managed supplies of RE created by this rule are any different from those already created by the fifteen-year facility age limit. Companies must engage with the entities managing the supplies to understand if those supplies have been certified with EACs, similar to the engagement already necessary to understand the commissioning dates of the facilities supplying RE.
    - Contracts with suppliers, where the supplier is unwilling or unable to share more information about the RE being supplied.
        - Likewise, the challenges for contracts with suppliers to comply with this rule are no different from the existing ones created by the fifteen-year facility age limit.
    - Companies were concerned about the burden of proof needed to comply with the rule. Some companies appeared to believe that the rule required them to provide RE100 with the serial numbers of all certificates tracking their claims to comply with the rule, or for them to hold their own registry accounts to cancel certificates or for the certificates to be cancelled in their names.
        - This is not what the rule requires. The rule only requires EAC cancellation by **or on behalf of** RE100 companies. Likewise, it does not require RE100 companies to provide RE100 with individual serial numbers from a supplier or intermediary. If a supplier or intermediary is able to prove to you that ‘your supply of RE is tracked with GOs’, then compliance with the rule is achieved. Note that your supplier or intermediary should anyway be giving you a detailed account of the certificates cancelled on your behalf to allow you to report on your claims in detail. Another technical criteria provision, the fifteen-

year facility age limit, requires you to learn more detailed information about your supply of RE (i.e. the commissioning dates of the generators supplying you with RE).

- One respondent indicated the rule could impact RE procurement from rooftop systems installed in under-served communities, arguing this is a high-impact form of procurement that cannot reasonably be expected to be met by EAC cancellation, since the systems do not meet metering, connectivity and tracking requirements to qualify for EAC issuance.
    - Metering and tracking are two crucial components of a credible claim. If a rooftop system is unable to meet those requirements to issue EACs then it is not appropriate to make a claim to RE100.

A call for evidence to relax the original off-taker exemption to the facility age limit

Feedback and RE100 comments

Feedback type	RE100 member company	Consultant or service provider	Supplier or utility	Special interest group	Civil society/NGO	Government or regulator	Other corporate	Total
General support	20	3	4	1	1	2	0	31
General opposition	5	9	0	3	2	0	2	21
No view	1	1	1	1	0	0	0	4

- 31/56 respondents generally supported relaxing the facility age limit exemption for project-specific procurement done as the original off-taker. 28/31 supporting relaxing the exemption provided detailed feedback for why.
- Several respondents indicated where, for regulatory reasons, a merchant period is unavoidable after project commissioning. In Korea, this period was indicated as 2-3 months. Other respondents generally indicated support for a limited merchant period (up to three years) for economic reasons (e.g., developers finding it attractive to sell near-term electricity or EACs at higher prices).
    - Redefining the exemption to consider unavoidable regulatory reasons for a merchant period before a corporate off-take is reasonable. If the delay is purely on a commercial basis, RE100 sees this as evidence that the subsequent corporate off-take is in fact not critical to the project's financing, meaning claims made through the off-take should only be recognized while the project is under fifteen years in age.
- Several respondents indicated the first long-term off-taker should benefit from exemption.
    - This is not a credible proposal. It suggests that a company could sign a PPA with a decades-old hydropower project previously operating merchant and be exempted from the facility age limit.
- Several respondents indicated force majeure/bankruptcy events should exempt a second off-taker from the facility age limit.
    - RE100 is not prepared to define criteria for this scenario.
- Several respondents indicated the timing of the signing of the off-take agreement was most important, arguing that signing of off-take before commissioning should merit facility age limit exemption irrespective of any merchant period after commissioning.
    - RE100 agrees the timing of the signing of the corporate off-take agreement is a valuable indicator of the off-take's importance to the project's financing. However, it is difficult for RE100 to specify what exactly is being 'signed' since different agreements may have very different stages in their negotiation. Furthermore, choosing the commissioning date as the point of comparison for the signing date may be less meaningful than choosing the timing of the investment decision for the project[2], which RE100 sees as a datapoint that may be difficult for companies to disclose on.

[2] An Exposure Draft of the GRI Energy Topic Standard has previously suggested companies can disclose 'whether the contract was signed prior to the investment decision to build the renewable generation facility' to give further context to their scope 2 claims.

- Some respondents suggested off-takers contracting with projects coming out of support programs should be exempted from the age limit.
    - This is a topic RE100 previously addressed in the 2022 technical criteria consultation when the facility age limit was first developed.

Inviting proposals to change Section Four of the technical criteria

Feedback and RE100 comments

Feedback type	RE100 member company	Consultant or service provider	Supplier or utility	Special interest group	Civil society/NGO	Government or regulator	Other corporate	Total
Proposed changes to Section Four	9	5	0	1	0	1	0	16
No view	17	8	5	4	3	1	2	35

- 16/51 respondents proposed new procurement type definitions.
- Many respondents requested unbundled EAC procurement be distinguished in different ways:
    - Many respondents called for unbundled EAC purchasing through long-term contracts to be distinguished from short-term or spot market purchasing arrangements.
        - This is a useful distinction currently not captured in the technical criteria or in any direct element of RE100 companies' disclosure to CDP. It is the only one of the three elements of what RE100 considers 'impactful procurement' (see Section Five in the technical criteria) that is not directly studied in disclosure (facility age and project-specificity are already studied in disclosure).
    - Some respondents called for a distinction between project-specific unbundled EAC purchasing and unbundled EAC purchasing that expresses no preference for project-specificity.
        - RE100 agrees this is useful. However, RE100 already has guidance for how a company can characterize its unbundled EAC purchase as project-specific in FAQ #81.
    - Some respondents called for a 'full off-take' distinction for unbundled EAC purchasing – where a company purchases EACs equivalent to a project's entire annual output – as a means of capturing higher-impact unbundled EAC purchasing.
        - RE100 doesn't think that this is a more meaningful distinction than commissioning date or agreement length.
- Several respondents requested that the Green Premium mechanism in Korea be given its own procurement type in the technical criteria. Some respondents also indicated they wished to see recognition of Green Premium surplus volumes as a form of default delivered RE.
    - The Green Premium is a form of retail contract with supplier available in Korea. Section Four in the technical criteria presents global definitions that can be understood in local contexts rather than listing examples of local mechanisms. Instead, RE100 will create a reference to the Green Premium in Appendix F (which helps companies understand how to interpret the technical criteria in certain local contexts).
    - RE100 hasn't seen evidence that it is currently possible to use surplus Green Premium RE to make credible default delivered renewable electricity claims.
- One respondent asked for more guidance around how to distinguish between retail and project-specific contracts with suppliers.

- RE100 is not prepared to define ‘retail’ and ‘project-specific’ in greater detail than the definitions included in Section One in the criteria.

- One respondent suggested re-naming retail contracts with suppliers as contracts with suppliers (with unbundled EACs) and project-specific contracts with suppliers as contracts with suppliers (with bundled EACs).
    - These proposals appear to distinguish between contracts with suppliers where the supplier owns the RE facilities and contracts with suppliers where the supplier does not own the RE facilities. While this is an interesting facet in RE supply to study, the retail/project-specific distinction is a distinction RE100 believes is more useful, more aligned with RE100’s views on impact, and more neutral with respect to how suppliers might operate (the proposed distinction would prevent electricity retail entities that do not own projects from offering what might be construed by audiences as ‘higher impact’ products; which is not an assertion RE100 is prepared to defend).
- Two respondents indicated their preference to remove a contractual relationship between the corporate buyer and a generator from the definitions of PPAs – effectively including the current definition of a project-specific contract with supplier within the physical PPA definition.
    - RE100 considers a contractual relationship between energy user and energy generator to be a defining feature of any PPA.
    - RE100 acknowledges in some markets it is difficult to distinguish between PPAs and contracts with suppliers (especially in vertically integrated markets). However, RE100 feels maintaining these types as distinct is still useful in the majority of cases.
- One respondent proposed a new flexibility mechanism for use in markets that are not liberalized to the point of offering PPAs, but have a high penetration of renewables in the generation mix (above 90%), where companies could ‘offset’ the dirty portion of the grid average mix using on-site generation.
    - It is not possible to claim to use the grid average of RE. On-site generation allows RE claims when consuming directly from the system, and also when retaining the attributes of any generation sold to the grid, to apply to electricity purchased from the grid at a different time. If, for example, a company consumes 50,000 MWh from the grid, and generates 10,000 MWh from on-site RE, 5,000 MWh of which is directly consumed with attributes retained, and 5,000 MWh of which is sold to the grid with attributes retained, then attributes for 45,000 MWh of electricity consumption must be sourced from the grid to reach 100% RE. Companies should both engage policymakers to lower barriers to PPAs and also procure RE through whatever existing, credible RE procurement options exist.
- One respondent asked for more clarity on how self-generated RE sold to the grid should be treated.
    - Self-generated RE sold to the grid can be sold as electricity or as electricity and its attributes together. If sold as electricity alone, those attributes (from the owned self-generation) can be applied to electricity purchased from the grid at a different time. While the electricity comes from the grid, the procurement type to report is self-generation. If both the electricity and the attributes from self-generation are sold to the grid, whatever electricity and attributes are purchased from the grid are categorized as a form of RE purchase, not self-generation.
- Several respondents submitted out-of-scope feedback (feedback that did not relate to Section Four), including:
    - Suggestions to redefine what makes a claim credible (in all cases, this meant removing market boundaries from the technical criteria).

- Proposals to remove the hydropower sustainability assurance requirement (asserting that the fifteen-year facility age limit is sufficient to assure sustainability).
- Proposals to allow EACs to be used to decarbonize on-site purchasing from CHP systems.
  - RE100 is not prepared to change its position detailed in FAQ #53 on how to decarbonize the electricity generated by CHP systems.
- Proposals to exclude all consumption of electricity from co-generating systems from RE100 targets.
- Reiterations of support for the proposed rule to require EACs for RE purchasing from the grid.

- One respondent suggested re-visiting the 2022 proposal to recognize physical procurement of renewable electricity across a market boundary as a new procurement type.
  - RE100 still has the same views as in 2022 for not yet creating criteria around these types of claims. Since 2022, CDP has produced a working paper outlining its views on these claims.