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May 15, 2014

Ann Cole
Director Office of Commission Clerk
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Ann Cole,

I am writing because you oversee electricity generation and reporting by certain utilities with business in your state. This letter contains information about electricity generation and purchases in your state, in particular the Renewable Energy Certificates (RECs) that were purchased separately from electricity generated in your state or purchased by one or more utilities in your state.

I manage the Green-e Energy certification program, which is a consumer protection program that certifies sales of Renewable Energy Certificates (RECs)¹ and renewable electricity (collectively called “renewable MWh” for the purposes of this letter). Electricity users can purchase certified renewable MWh in order to voluntarily use more renewable electricity than they would otherwise receive through their electric utility service. Green-e Energy collects data on such voluntary renewable MWh purchases, and we are providing data to you to ensure that voluntarily-purchased renewables are not counted toward your state’s Renewable Portfolio Standard, GHG reporting goals, or another conflicting obligation related to emissions or renewable electricity.

This letter serves to help you prevent double counting of renewable MWh by informing you of the quantity of electricity, which has been stripped of its RECs, that is generated or purchased by certain utilities. Electricity that is generated by a renewable electricity facility and has been separated from the RECs generated with it cannot be considered renewable electricity, because *RECs are the means to identify and claim which resource was used to generate renewable electricity*. Such electricity is commonly called “null power,” and is typically treated as if it were power from the spot market because it cannot be linked back to a particular generation facility or resource type.

Utilities delivering this electricity without its RECs should not be allowed to count this electricity toward any state Renewable Portfolio Standards, mandates, disclosures of electricity delivered to customers that identify the generator’s resource type, or the like; otherwise the RECs are considered double counted and are ineligible for separate sale. Similarly, when calculating emissions from electricity consumed in the state, electricity stripped of RECs should not be considered zero or low-emissions.

¹ RECs are tradable commodities that are used to track and allocate the use of renewable electricity in the US. RECs represent the environmental attributes of 1MWh of electricity generated from a renewable resource, including the fact that the electricity produced low or no CO₂ emissions.

See the details below for the quantity and generation period of RECs sold separately from electricity that was generated or purchased by utilities in your state. The environmental protection agency in your state is being contacted with this information as well.

Transaction Details for Sales Made in 2012*

Generation Facility Name	Generation Facility State	Renewable Resource Type	Number of RECs (MWh) Sold Separately from Electricity	Period of Generation (Quarter/Year or Month/Year)	Null Power Purchaser in your State
Arndt Farm	NC	Solar	1,108	11/2012, 12/2012	Duke Energy
Belwood Farm	NC	Solar	176	12/2012	Duke Energy
Brevard Energy	FL	Gaseous Biomass	83,907	Q1/2012, Q2/2012, Q3/2011, Q4/2011	Florida Power & Light Company
Catawba County Blackburn Landfill	NC	Gaseous Biomass	25,495	Q1/2012, Q2/2012, Q3/2011, Q3/2012, Q4/2011, Q4/2012	Duke Energy
Chadbourn Farm	NC	Solar	434	12/2012	Duke Energy Progress
G2 Energy Marion	FL	Gaseous Biomass	935	Q1/2012	Florida Power & Light Company
Georgia-Pacific Palatka	FL	Non-Gaseous Biomass	61,132	Q1/2012, Q2/2012, Q4/2011	Florida Power & Light Company
Hernando Landfill Plant	FL	Gaseous Biomass	12,411	Q1/2012, Q2/2012, Q3/2011, Q4/2011	Seminole Electric Cooperative Inc.
Jonathan A. Roberts	NC	Solar	1	Q1/2012, Q2/2012, Q3/2012, Q4/2012	Duke Energy
LFG01-G2 Energy (Marion) LLC-Baseline Landfill Gas	FL	Gaseous Biomass	20,854	1/2012, 10/2011, 11/2011, 12/2011, 2/2012, 3/2012, 4/2012, 5/2012, 6/2012, 8/2011, 9/2011	Florida Power & Light Company
Mocksville Farm	NC	Solar	824	11/2012, 12/2012	Duke Energy
Naples Landfill Project	FL	Gaseous Biomass	27,708	Q1/2012, Q2/2012, Q3/2011, Q4/2011	Florida Power & Light Company
Okeelanta	FL	Non-gaseous Biomass	110,411	Q3/2011, Q3/2012, Q4/2011	Florida Power & Light Company
Okeelanta	FL	Non-gaseous Biomass	110,411	Q3/2011, Q3/2012, Q4/2011	Seminole Electric Cooperative Inc.
Okeelanta	FL	Non-gaseous Biomass	110,411	Q3/2011, Q3/2012, Q4/2011	The Energy Authority
Okeelanta TG2	FL	Non-gaseous Biomass	40,000	Q1/2012, Q2/2012	Florida Power & Light Company
Okeelanta TG2	FL	Non-gaseous Biomass	40,000	Q1/2012, Q2/2012	Seminole Electric Cooperative Inc.
Okeelanta TG2	FL	Non-gaseous Biomass	40,000	Q1/2012, Q2/2012	The Energy Authority
Palatka Operations	FL	Non-Gaseous Biomass	141,930	Q3/2011, Q3/2012, Q4/2011	Florida Power & Light Company

Palatka Operations	FL	Non-Gaseous Biomass	52,000	Q3/2011	Florida Power & Light Company
Raeford Farm	NC	Solar	591	11/2012, 12/2012	Duke Energy Progress
Seminole Energy Llc	FL	Gaseous Biomass	16,153	Q1/2012, Q2/2012	Seminole Electric Cooperative Inc.
Telogia Power Llc	FL	Non-Gaseous Biomass	77,620	Q1/2012, Q2/2012, Q3/2012, Q4/2011	Seminole Electric Cooperative Inc.
Telogia Power LLC	FL	Non-gaseous Biomass	30,517	Q3/2011, Q4/2011	Seminole Electric Cooperative Inc.
Telogia Power LLC	FL	Non-gaseous Biomass	58,703	Q1/2012, Q2/2012, Q4/2011	Seminole Electric Cooperative Inc.
Warrenton Farm	NC	Solar	123	12/2012	Duke Energy Progress
Okeelanta	FL	Non-gaseous Biomass	110,411	Q3/2011, Q3/2012, Q4/2011	Tampa Electric Company
Okeelanta TG2	FL	Non-gaseous Biomass	40,000	Q1/2012, Q2/2012	Tampa Electric Company
Orange County Landfill Gas/Stanton Energy Center	FL	Gaseous Biomass	66,846	1/2012, 10/2011, 11/2011, 12/2011, 2/2012, 3/2012, 4/2012, 5/2012, 6/2012, 7/2011, 8/2011, 9/2011	Orlando Utilities Commission
Port Charlotte Landfill Gas Project	FL	Gaseous Biomass	11,452	1/2012, 10/2011, 11/2011, 12/2011, 2/2012, 3/2012, 4/2012, 5/2012, 6/2012	Orlando Utilities Commission

*This data reflects the overall total generation from this facility during the designated quarter, and not necessarily the total amount that was sold into your state. Please contact the generator facility for specific information.

For information about the Green-e Energy certification program and its requirements, or to ask questions about how this letter is best used, see www.green-e.org/Energy or email us at verification@resource-solutions.org. The table above can be sent to you electronically upon request.

Sincerely,



Alex Pennock
Green-e Energy Manager