



# EPA's Green Power Partnership Partnership Requirements

**U.S. Environmental Protection Agency**

September 2017

# Partnership Requirements

## Summary

- Partner organizations can join at a facility level up to an organization-wide commitment (U.S. facilities only).
- Partner organizations must procure green power in amounts proportional to their annual electricity use.
- Eligible renewable resources include wind, solar, geothermal, qualifying biomass, and low-impact hydropower.
- Partner organizations can meet the minimum usage requirements with any of the following products (either singly or in combination): community choice aggregation, competitive supplier green power products, power purchase agreements, renewable energy certificates (RECs), self-supply, shared renewables, utility green power products, and utility green tariffs.

## I. Introduction

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

## II. Eligible Organizations

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

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

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

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

### III. Scope of Participation

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

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

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

Only organizations joining at the organization-wide level are eligible for inclusion on the GPP's 100% Green Power Users list.

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

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

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

### IV. Incremental Green Power Requirement

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

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

1. Renewable electricity generation is used to satisfy RPS mandates or goals imposed by federal, state or local governments on utilities or load serving entities.
2. Renewable electricity generation is included in an undifferentiated power product (e.g., standard electricity service or utility system mix).

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

3. Renewable electricity generation is being paid for by all customers (e.g., in a utility's standard rates).
4. Renewable electricity generation comes from an eligible renewable generator that has been mandated by a local, state, or federal government agency (e.g., in a consent decree).
5. Renewable electricity generation is purchased instead of paying a system benefits charge for renewable electricity (e.g., a self-directed system benefits charge).
6. Renewable electricity generation is purchased as part of a Supplemental Environmental Project (SEP) under a Clean Air Act enforcement action.
7. Renewable electricity generation is sourced from a state that has a mandatory GHG cap in place for power plant emissions or similar regulatory mechanism, unless emission allowances are retired on behalf of the renewable energy buyer, such as in the Regional Greenhouse Gas Initiative (RGGI). For purchases from those states to be eligible and result in GHG emission reduction claims, Green Power Partners should communicate with their provider about whether the necessary administrative steps are being taken to secure this result.

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

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

## V. Yearly Reporting Requirement

Partners are asked to update EPA when a change occurs to their green power use or partnership status. In addition, each year, the GPP will provide each Partner's primary contact with a Partner Yearly Report summarizing the organization's last reported green power use and partnership status. Partners must review, update, and return the Partner Yearly Report to EPA. Partners that fail to return a Partner Yearly Report or otherwise provide an update to EPA risk suspension. For additional information, please see Section XIX (Partner Suspensions).

Partners can review the data EPA has on file for their organization by requesting a completed version of the Partner Yearly Report from the GPP.

## VI. Minimum Usage Requirement

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

Partners must procure green power in amounts that meet or exceed EPA's minimum usage requirements by the time they submit a Partnership Agreement.

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

Partners with on-site systems, either owned by the Partner or a third-party, that do not own the RECs associated with the system may not claim that the electricity they are using is renewable. The electricity generated from an on-site system where the RECs have been conveyed to another party does not qualify in meeting EPA usage requirements. Partners may, however, replace the RECs conveyed from an on-site system through a secondary green power purchase in order to qualify for the GPP.

### Assessing Your Organization’s Minimum Usage Requirement

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

1. Decide the organization’s scope of partnership (i.e., facility level up to organization-wide / U.S. operations only).
2. Calculate an annualized (i.e. 12-month period) electricity use for the scope of partnership. Organizations can use recent utility bills to estimate their projected electricity use.
3. Organizations that have no access to or control over electricity use or billing data (e.g., for leased space) can estimate total electricity use based on square footage. Multiply the total square footage of your chosen scope of partnership by an electricity consumption factor of 16.2 kWh per square foot per year (or .0162MWh/sf/year). This is a national average for U.S. commercial buildings of all space types<sup>2</sup>.
4. Organizations can use the table below to find the kilowatt- hours (kWh) range for their annual electricity use (i.e., their “baseload”) and identify the corresponding percentage of green power required to meet EPA’s minimum requirements.

EPA will periodically review and update the minimum usage requirements to keep pace with the market and buyer patterns. As of September 2017, the Green Power Leadership Club was discontinued.

**Table 1: Minimum Usage Requirements**

If your annual electricity use in Kilowatt-hours is...	You must, at a minimum, use this much green power when you join the Partnership
≥ 100,000,001 kWh	3% of your use
10,000,001 - 100,000,000 kWh	5% of your use
1,000,001 - 10,000,000 kWh	10% of your use
≤ 1,000,000 kWh	20% of your use

The minimum usage in kilowatt-hours (kWh) must be greater than the highest possible requirement in kilowatt-hours for the next lower benchmark level. For example, an organization with a baseload electricity

<sup>2</sup> Energy Information Agency, [www.eia.gov/consumption/commercial/data/2012/index.cfm?view=consumption](http://www.eia.gov/consumption/commercial/data/2012/index.cfm?view=consumption)

use of 100,000,001 kWh (3 percent benchmark level) would be required to use 5,000,000 kWh a year minimum, which equals the highest possible requirement for the 5 percent benchmark category.

## VII. Energy Efficiency Improvements and Buying Green Power

EPA encourages Partners to pursue energy efficiency improvements and can refer Partners to ENERGY STAR® for more information. Efficiency efforts may reduce Partners' total electricity use. The GPP requires that Partners provide a yearly update on electricity load and green power use (see Section V Yearly Reporting Requirement). Partners can report efficiency-related reductions in total electricity consumption through this process.

## VIII. Eligible Sources of Green Power

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

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

EPA requires that a Partner's green power use be supplied from U.S.-based facilities. And, to support developing more renewable energy capacity nationwide, EPA requires that Partners use green power from "new" renewable energy facilities. EPA defines "new" as those facilities put into service within the last 15 years (on or after January 1 of the year 15 years prior to the current date). This rolling 15-year new date will help continuously drive the development of new renewables.

The following are eligible green power resources:

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

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

## XVIII. Partner Recognition

### Green Power Partner Mark

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

The Partner Mark Use Guidelines outline how Partners should use the Partner mark in promoting their partnership with EPA.

In all cases, please notify EPA when using the Partner mark. The Partner Mark Use Guidelines are available at [www.epa.gov/greenpower/green-power-partner-mark-use-and-display-guidelines](http://www.epa.gov/greenpower/green-power-partner-mark-use-and-display-guidelines).

For more information about using the Green Power Partner mark, please contact Christopher Kent ([kent.christopher@epa.gov](mailto:kent.christopher@epa.gov)).

### National Top Partner Lists

Partners can earn placement on one or more of EPA's Top Partner lists. EPA updates these lists quarterly. The update schedule and Partner data deadlines are available on the Partnership website at [www.epa.gov/greenpower/green-power-partnership-top-partner-rankings](http://www.epa.gov/greenpower/green-power-partnership-top-partner-rankings).

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

- National Top 100 List
- Fortune 500® Partners List
- Top 30 College & University List
- Top 30 K-12 Schools List
- Top 10 Federal Government List
- Top 30 Local Government List
- Top 30 Tech & Telecom List
- Top 30 On-site Generation List
- Top 30 Retail List
- 100% Green Power Users List
- Green Power Partnership Long-term Contracts

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

Clemson University  
Ravenel District  
2018

Energy:

Account #71802002	152,544 kWh used	Windload
Account #71802003	52,896 kWh used	Gas Turbine
Account #71802004	164,640 kWh used	ARTS
Account #1713010	<u>29,320 kWh used</u>	High Voltage

**Total** 399,400 kWh used

Renewables:

Green Power 42 blocks	100,800 kWh	> Tony provides
Fluor Daniel Solar	19,237 kWh	
BioLife Science Solar	<u>24,111 kWh</u>	

**Total** 144,148 kWh

EPA Green Power Partnership Requirements:

≤ 1,000,000 kWh 20% of use

144,148 kWh / 399,400 kWh = **36.1%**



Clemson University  
Ravenel District  
2017

Energy:

Account #71802002	190,944 kWh used
Account #71802003	57,024 kWh used
Account #71802004	153,280 kWh used
Account #1713010	<u>30,960 kWh used</u>

**Total** **432,208 kWh used**

Renewables:

Green Power 42 blocks	100,800 kWh
Fluor Daniel Solar	19,237 kWh
BioLife Science Solar	<u>24,111 kWh</u>

**Total** **144,148 kWh**

EPA Green Power Partnership Requirements:

≤ 1,000,000 kWh 20% of use

144,148 kWh / 432,208 kWh = **33.4%**