

— Frequently Asked Questions (FAQs) – Technical

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JOINING RE100

1. Can any company join RE100?

No, there are some joining requirements. One of them is having an annual electricity consumption of 0.1 TWh or greater. Please see all the requirements in the [RE100 joining criteria](#).

2. Can a company join if they are already consuming 100% of renewable electricity?

Yes, companies who already consume 100% of renewable electricity can join RE100 and commit to maintain this target year on year. To be able to claim 100% renewable electricity consumption, those companies will have to send us detailed data in order for us to verify whether their claim meets the RE100 technical criteria.

All our technical documents can be found [here](#).

3. What are the next steps once a company joins the RE100 campaign?

RE100 member companies must progress towards their 100% commitment in line with the [Technical Criteria](#), and once the target is achieved, maintain it year on year.

They must report on this progress on an annual basis via the RE100 reporting spreadsheet and/or the CDP climate change questionnaire.

Companies are also encouraged to take part in the campaign activities, to share knowledge with peers, inspire others to follow, and publicly advocate for the clean electricity revolution.

SETTING A TARGET: SCOPE AND EXCLUSIONS

1. What is included in the RE100 target?

The RE100 target is a consumption target. The goal is to be consuming 100% renewable electricity by the target year. All electricity consumed, coming from both self-generation and purchase from utility/supplier is included in the target.

This means all operations falling within the scope 2 of your company's GHG inventory and any portion of the scope 1 relating to electricity generation consumed by the company. For instance, a CHP plant used to generate electricity for self-consumption is within the scope of the RE100 target. If the electricity produced is sold to the grid or a third party, it does not fall in the scope of the target.

To consolidate your company's electricity consumption data, RE100 recommends using the [Corporate Accounting and Reporting Standard](#) by the GHG protocol, which will help setting your organizational boundary and operational boundary.

Boundary setting is an important step to consolidate company's electricity consumption data. Organizational boundaries define the operations that company owns, or controls and operational boundaries involve identifying electricity consumption associated with its operations, categorizing them as direct and indirect emission sources.

As per this standard, there are two distinct approaches that can be used to consolidate electricity consumption:

- a. **The equity share:** Under the equity share approach, a company accounts for electricity consumption from operations according to its share of equity in the operation.
- b. **The control approach:** Under the control approach, a company accounts for 100% of the electricity consumption from operations over which it has control. Further, there are two approaches within the control approach – Financial control and Operational control. The company has financial control over the operation if the former has the ability to direct the financial and operating policies of the latter with a view to gaining economic benefits from its activities. A company has operational control over an operation if the former or one of its subsidiaries has the full authority to introduce and implement its operating policies at the operation.

Please make sure that you are using the same approach for your GHG inventory and setting your RE100 target.

2. Are subsidiaries included in the RE100 commitment?

Generally yes, with some exceptions.

Generally, companies must join the campaign at the group level. However, an exception can be made if a subsidiary company 1) has clear separate branding from the parent company, AND 2) has an electricity consumption greater than 1 TWh/year.

Please see the [RE100 joining criteria](#) for more details.

3. Can some operations be excluded from the RE100 target?

Yes. The RE100 target is set across all operations worldwide, however some operations can be excluded from the scope of the RE100 target, provided they meet the [materiality threshold](#).

Operations up to 100 MWh located in countries where there are no options to source renewables can be excluded from the scope of the target. In total, 500 MWh maximum can be excluded.

Please see the document on the [materiality threshold](#).

4. Are leased offices included in the RE100 target coverage? If the landlord has control over the electricity consumption, what is the lessee expected to do?

RE100 commitment covers all electricity, purchased or self-generated, by a company as per the consolidation approach company has used (please refer FAQ 2 to know more about the consolidation approach). The selected consolidation approach (equity share or one of the control approaches) is also applied to account for and categorize direct (scope 1) and indirect GHG emissions (scope 2) from leased assets. **If the selected equity or control approach does not apply, then the company may account for electricity consumption from the leased assets under scope 3.**

Depending on the consolidation approach used, the tenant may need to include electricity consumption in the RE100 target coverage. The electricity consumption by the tenant is usually metered, but in case of unmetered connection, the electricity consumed by the tenant should be estimated based on the portion of area occupied by the tenant in the building. It is recommended to make third party verification for such estimations as a part of their existing GHG audit process or through an independent audit process.

If the landlord purchases renewable electricity for the entire building where the tenant has occupied one or more floors, tenant can claim RE usage provided it has a contractual arrangement with the landlord reflecting the transfer of ownership of RE attributes to the tenant.

5. Is backup generation included in the scope of the RE100 target?

No, but only in specific cases.

The scope of the RE100 commitment for members that joined after January 2017 includes any electricity produced and consumed by the member.

The electricity production could come from fossil fuels in the form of backup generators, peak shaving generation, prime-power generation, or the electricity generated by a combined heat and power (CHP or cogeneration) system. Backup electricity generation is common across many industries, however true backup generation is rarely in use, and thus does not make a significant difference if company remove it from the target coverage. It also reduces reporting burden on the company.

Thus, scope 1 electricity consumption from emergency backup generation **used only in the case of grid outage** can be excluded from the RE100 target. However, RE100 require greening prime power and CHP as well as systems used regularly for construction and peak shaving.

6. Is there a deadline to achieve the RE100 target?

Yes. The minimum requirements are 100% by 2050, with interim steps of at least:

- 30% by 2020
- 60% by 2030
- 90% by 2040

However, the majority of members companies have a target date set between 2020 and 2030.

For companies headquartered in South Korea and Japan, those intermediate targets are recommended but not mandatory.

New members headquartered in those two countries must agree to do active policy engagement. They are asked to publicly call for a numerical target of renewable electricity deployment in the country and for an increase accessibility of renewable electricity for corporate buyers, in order to contribute to the acceleration of the expansion of renewable electricity in those countries.

ACHIEVING THE RE100 TARGET

1. How should we develop our roadmap to 100% renewables?

The RE100 members develop their roadmap to 100% renewables as they wish. RE100 does not support for this process, but only a set of criteria the members shall comply to. Generally, RE100 does not offer consultancy services.

The [CDP Accredited Solution Provider](#) list here can provide you support for developing your strategy.

2. Is there a process of verification before companies can claim that they achieved their RE100 target?

Yes. We verify whether the companies have reached 100% in line with the [Technical Criteria](#) before we support any public announcement about reaching their RE100 target. To do this verification, we require detailed country level data about electricity consumption, procurement and generation. Currently this means completing the RE100 reporting spreadsheet and sending it to re100@cdp.net. We will do the verification within maximum 10 working days. The Climate Group should also be contacted as they will support the announcement and the communication.

3. What if a company cannot meet its RE100 target on time because of operations located in countries without renewable electricity sourcing options?

Some companies are and will be unable to meet their RE100 targets on time. This is in particular the case for big companies with operations all over the globe.

All markets will develop eventually, but in the meantime, the companies can get “stuck” at a certain percentage of renewables. RE100 considers that the companies sourcing renewables where possible are showing leadership, even if they cannot reach the 100% fully. If no renewable electricity sourcing options are available in a country that is a failure of the market and policy, not of the companies wishing to procure renewable electricity.

RE100 recommends that members to be transparent on the barriers they face and highlight those barriers where possible. In 2020 RE100 emphasized those barriers, as reported by members, in the [Annual reports](#). Companies can choose to delay their target year if desired and RE100 can also provide comms support around those achievement and claims.

4. What is next once a company achieves 100%?

Once a company have achieved their RE100 target, they are expected to maintain it year on year. They can also look at increasing their impact by using more impactful procurement option or engaging with their supply chain on renewables. See more information in our [Leadership paper](#).

RENEWABLE ENERGY SOURCES

1. Which sources of energy does RE100 consider 'renewable'?

RE100 considers electricity produced from the following energy sources as renewable:

- Geothermal
- Solar
- Water, including tidal energy and large and small hydropower
- Wind as renewable energy sources
- Biomass (including biogas) provided it meets strict sustainability criteria

Biomass and hydropower can play a role in decarbonization provided they are created and used sustainably. RE100 recommends using standards to secure sustainability claims associated with the use of biomass and hydropower. The following standards/guidance can for instance be used: the ISO 13065:2015 (specifies principles, criteria and indicators for the bioenergy supply chain to facilitate assessment of environmental, social and economic aspects of sustainability), the Green-e® Renewable Energy Standard for Canada and the United States, and the Low Impact Hydropower Institute (LIHI).

Waste heat recovery (WHR) based electricity generation where the primary source of energy is fossil fuels and Integrated Gasification Combined Cycle (IGCC) technology are not considered as renewable sources of energy.

2. Does RE100 consider fuel cells to be renewable energy?

It depends on the source of the fuel. A fuel cell itself is not inherently renewable or non-renewable. If it is consuming fuel generated from a renewable source, then the electricity output of the fuel cell can be considered as renewable. A fuel cell consuming natural gas cannot be considered as a renewable energy source.

3. Does RE100 consider energy storage to be renewable energy source?

No. Energy storage systems are an essential part of a highly renewable grid, but they cannot be considered as renewable sources of energy.

Energy storage systems are not inherently renewable or non-renewable. A storage system can store electricity produced by renewable sources or non-renewables sources and what makes the electricity renewable is not the fact that it was stored but rather how it was generated. RECS issued for energy storage are not valid for RE100.

REPORTING

1. What data is requested by RE100 during the reporting process and why?

RE100 is a campaign for businesses committed to sourcing 100% renewable electricity. To track member progress, maintain the credibility of the campaign, and to gather the data necessary to advocate on behalf of renewable electricity RE100 requires the transparent and accurate reporting of the organization's electricity and renewable electricity consumption. RE100 also asks for other information such as the organization's strategy towards renewable electricity sourcing, types of renewable electricity sourcing options and technology.

The RE100 reporting process is managed by CDP. Companies can either report data via their [CDP Climate Change questionnaire](#), or/and via the RE100 reporting spreadsheet. We would encourage all members to report via the RE100 spreadsheet when possible as this provides granular country level data. This helps us identify where companies are struggling to source renewables and allows us to direct our efforts to help support our members and change this.

RE100 verifies the data that companies are submitting against the RE100 Technical Criteria and further use the data for analysis, for instance to prepare the [RE100 annual progress reports](#).

GUIDELINES AND TECHNICAL CRITERIA

1. Are there guidelines which companies can use to report their renewable electricity consumption data in a credible manner?

Yes.

- The RE100 [Technical Criteria](#)
- "[Making Credible Claims](#)" – provides a set of criteria that renewable electricity sources and purchasing mechanisms must meet in order to support credible renewable electricity usage and delivery claims. These criteria can be applied to a local electricity market regardless of the type of market and the stage of market development. This briefing also provides guidance for verification, reporting, and communication of renewable electricity use.
- The [RE100 criteria](#) and [Credible Claims](#) principles can be applied by companies in all markets. Where there is sufficient member demand RE100 will attempt to provide market specific guidance but with members operating in over 150 markets this is not possible everywhere.

2. Is the Technical Criteria revised regularly? Are the rules subject to change? Why?

Yes, the Technical Criteria are reviewed regularly and changed when necessary, to:

- Ensure the campaign remains credible as renewable electricity markets evolve;
- Clarify issues where there has been repeated misinterpretation of existing criteria; or
- Provide new interpretations based on frequent questions from members.

Any changes or new versions are published in the first quarter of every calendar year. If the changes are more restrictive, members will be given notice and enough time to revise or adjust their procurement strategy. Changes that are more permissive may be implemented at the time of publishing.

CREDIBLE AND UNIQUE CLAIMS

1. What is “double counting” of renewable electricity claims?

Double counting refers to two or more companies claiming the same renewable electricity. In order to make a credible claim of renewable electricity consumption, the buyer must have an exclusive claim, normally supported by an energy attribute tracking instrument such as Guarantee of Origin (GO) certificate in Europe. The instrument must be retired by or on behalf of the entity reporting the claim to ensure that there are no other claims being made on the same generation attributes. An example of double counting would be if a wind farm is selling electricity and GOs separately and the purchaser of the electricity claims to be consuming renewable electricity. Only the holder of the GOs can claim to be consuming renewable electricity.

2. What is a renewable energy contractual instrument?

A renewable energy contractual instrument is a contract between two parties for the sale and purchase of energy bundled with attributes about the energy generation, or unbundled attribute claims. Markets differ as to what contractual instruments are commonly available or used by companies to purchase energy or claim specific attributes about that energy, but they can include energy attribute certificates (RECs, GOs, etc.) and direct contracts such as Power Purchase Agreements (PPAs).

3. What are the quality criteria for tracking instruments?

In order to make credible claims about the contractual allocation of attributes, the following criteria must be met:

- Credible generation data
- Attribute aggregation
- Exclusive ownership (no double counting) of attributes
- Exclusive claims (no double claiming) of attributes
- Geographic market limitations of claims; and
- Vintage limitations of claims

For further information on these criteria please refer to the [“Making Credible Claims”](#) paper.

RENEWABLE ELECTRICITY SOURCING OPTIONS

1. What sourcing methods are currently accepted by RE100?

The list of sourcing methods accepted by RE100 can be found in our [Technical Criteria](#).

The criteria also explain how to make credible unique electricity usage claims for each of the sourcing options.

2. Can we claim the % renewable electricity in the grid?

In general, no. The goal of RE100 is to have carbon free grids by 2040 and this requires action by corporate consumers. There are only two specific cases when companies can

claim this for RE100. The first is when their utility/ supplier is retiring energy attribute certificates on behalf of their customers. The second is when the grid is 95% or more renewable and there is no mechanism for actively sourcing renewable electricity from the grid. For the full criteria to claim via either of these methods please see the [RE100 technical criteria](#). RE100 allows these two limited cases because in the first consumer has a credible claim to the electricity AND this incentivizes the consumer to advocate to policymakers for more ambitious renewables mandates on suppliers and in the second, we don't think that requiring consumers to develop a new procurement method or tracking system in a grid that is already almost 100% renewable is impactful.

Companies cannot claim the grid mix in general because claiming the percentage renewables from the grid mix will be essentially double counting the renewable energy attributes conveyed by the specific renewable electricity market instruments such as direct contract with the supplier, and energy attribute certificates.

3. What about countries or regions with a high percentage of renewables in the grid?

RE100 recognizes that some countries have a high percentage of grid renewables and no mechanism for voluntary procurement of renewable electricity from the grid. RE100 also recognizes that it is not beneficial to create unnecessary cost or bureaucracy for companies operating in markets where this is the case. Therefore, RE100 members can, in their RE100 reporting, count all of their electricity consumption from the grid as renewable (i.e. take a passive approach) in a country **when the default grid mix of renewables is over 95% and when there is no mechanism for actively sourcing renewable electricity from the grid.**

This only applies when the entire **national grid** is at a high percentage (i.e. one state or region being over 95% does not allow for a passive claim) and **does not apply to electricity consumption in that country from sources other than the grid.** This means that in case of state/province/region in the country have over 95% RE in the local grid, companies shall not claim RE usage, for example Quebec has over 95% RE in the local grid, however companies operating in the region still cannot claim RE from the grid as Quebec is one of the thirteen provinces and territories of Canada, and the above criteria is only applicable at the national level.

At present RE100 has found that only Paraguay, Uruguay, and Ethiopia meet these criteria. Other countries with a high percentage of renewables on the grid such as Norway and Iceland are not eligible for passive claims as the renewable attributes from the electricity have been transacted to specific customers. This also does not apply to countries such as Nepal which have a high percentage of domestic renewable electricity but import significant amounts of electricity.

This list of countries is subject to change as the market and the grids evolve and members are welcome to present data from other countries that they think should be included.

Note: If you find evidence that a certain country is meeting those conditions please send the information to re100@cdp.net for us to evaluate it.

Please refer to the full text in the [RE100 Technical Criteria](#) on these passive procurement methods.

4. Why do we have to buy renewable electricity in Costa Rica when the grid is already over 99% renewable?

As per the [RE100 Technical Criteria](#) (see point 6.2), RE100 recognizes that some countries have a high percentage of grid renewables and no mechanism for voluntary procurement of renewable electricity from the grid. RE100 members can, in their RE100 reporting, count all of their electricity consumption from the grid as renewable (i.e., take a passive approach) in a country when the default grid mix of renewables is over 95% **and** when there is no mechanism for actively sourcing renewable electricity from the grid.

In the case of Costa Rica, active renewable electricity sourcing mechanisms are available for corporates, for example I-RECs.

RE100 recommends that companies take an active approach to sourcing renewable electricity. Therefore, companies having operation in Costa Rica should not claim grid renewables and procure renewable electricity actively.

5. What if there is a government mandated renewable electricity target imposed on our company due to our large electricity consumption?

If a renewable electricity target directly applies to your company and you are procuring renewable electricity to meet it, this procurement can be counted for RE100 as long as it meets the rest of the [Technical Criteria](#).

6. The Australian ACT is 100% renewable; can we count it as renewable?

As per the [RE100 Technical Criteria](#) (see point 6.1), RE100 members can claim renewable electricity usage from the default delivered / standard product offering by an energy supplier when, **and only when**, the supplier is retiring Energy Attribute Certificates on behalf of those customers that meet the Energy Sources and Technologies and Credible Claims criteria in Sections 3 and 4 of the [Technical Criteria](#).

If utilities/suppliers in the Australian ACT procure and retire Large-scale Generation Certificates (LGCs) for 100% of a company's electricity supply, then the company can claim 100% renewable electricity usage. Companies should be prepared to support their claim to RE100. For example, a RE100 member shall ensure that they have robust data from their utilities/suppliers to support these claims, particularly where alternative compliance mechanisms are available to utilities/suppliers and the compliance data may not be available or sufficiently detailed.

7. What about New Zealand? The grid is already 85% renewable, why can't we claim it?

It is possible to procure renewable electricity in New Zealand meaning that the only consumers in New Zealand that have a claim to renewable electricity are those that are specifically buying it. New Zealand also has an energy attribute certificate system which can be used for transacting renewable electricity. For more information on what gives a consumer a unique claim to renewable electricity please see the [credible claims paper](#).

8. In British Columbia, Manitoba, Quebec, grids are 98%, 99.8%, and 99.6% renewable, what are the expectations around 100% of the electricity load in these provinces being sourced through renewable contractual instruments/RECs/PPAs/etc for RE100?

As per the [RE100 Technical Criteria](#) (see point 6.2), RE100 recognizes that some countries have a high percentage of grid renewables and no mechanism for voluntary procurement of renewable electricity from the grid. RE100 members can, in their RE100 reporting, count all of their electricity consumption from the grid as renewable (i.e., take a

passive approach) in a country when the default grid mix of renewables is over 95% **and** when there is no mechanism for actively sourcing renewable electricity from the grid.

However, this only applies when the entire national grid is at a high percentage and **does not apply to one state or region e.g. Quebec, etc.** We recommend companies having operations in these regions to work with the utilities/suppliers and explore if they can provide customers with a green electricity product (e.g., green tariffs) supported by a contractual instrument to prove the origin of their electricity supply.

9. Does RE100 accept cross border VPPAs (virtual power purchase agreements)?

RE100 only accepts cross border VPPAs from within the same market boundary, for example within the defined European [Market Boundary](#). The concept of a VPPA between Brazil and Argentina, for example, doesn't make sense as they are not part of the same market for renewable electricity.

10. Can carbon offsets or avoided emission statements be used to meet the RE100 target or for making renewable electricity consumption claims?

No. Offsets and EACs are fundamentally different instruments. The offset represents a quantity of global GHG emissions reduced or avoided by the project compared to a baseline scenario of what emissions would have occurred in the absence of the offset-funded project. Offsets, and their global avoided emissions claim, represent a different instrument and claim from the energy attributes associated with electricity production. Offsets convey tons of avoided CO₂ using project-level accounting, but they do not convey information about direct electricity generation emissions occurring at the point of production, like EAC do.

Thus an offset does not confer any claims about the use of electricity attributes applicable to scope 2.

Please check section *8.2.4 Relationship to offset credits* in the [GHG protocol's scope 2 guidance](#)¹ for more details.

11. Does RE100 have requirements on the age / commissioning date of the power plant from which the electricity is purchased? Is RE100 looking into the topic of additionality?

No, RE100 currently does not have requirements, only a recommendation to have a strategy that focuses on the purchase of unbundled EACs from relatively new projects, where the purchase of the EACs can have an impact on the financing of the project. Purchasing EACs originating from older generation does little to encourage further capacity building. A reasonable rule of thumb is to buy from generation commissioned within the last 15 years.

In 2021, a question about commissioning dates has been added to the RE100 reporting spreadsheet. This is a topic RE100 will be looking at in the coming years based on the data collected during the reporting process.

More recommendations can be found in the [RE100 leadership paper](#).

¹ https://ghgprotocol.org/scope_2_guidance

ENERGY ATTRIBUTE CERTIFICATES (EACs)

1. What is an Energy Attribute Certificate (EAC)?

An Energy Attribute Certificate (EAC) is a category of contractual instruments used in the electricity sector to convey information about electricity generation to other entities involved in the sale, distribution, consumption, or regulation of electricity. Typically, 1 EAC = 1 MWh of renewable electricity. EACs are issued to renewable electricity generators operating within the same market boundary as the claimant. EACs exist in markets with reliable tracking systems to ensure that no double counting of the attributes takes place. EAC can be source bundled as well as unbundled, where a bundled EAC means that it comes with the physical delivery of electricity (such as through a direct PPA), and unbundled means that it comes without the physical delivery of electricity. It is important to note that EAC's are not offsets. They are contractual instruments that allow companies to accurately account for their renewable electricity purchases.

2. Which Energy Attribute Certificate (EACs) are currently accepted by RE100?

The following Energy Attribute Certificates are currently accepted:

- REC (US and Canada)
- GOs or REGO (Europe)
- T-REC (Taiwan)
- J-Credit, NFC, GEC(Japan)
- I-REC (International)
- TIGR (International)
- GEC (China)
- NZREC (New Zealand)
- Other tracking instruments that meet the criteria for contractual allocation of attributes outlined in the RE100 [“Making Credible Claims”](#) paper.

3. How can I get RE100 to endorse a particular REC/EAC system?

We have limited resources to verify EAC systems and focus them on government systems where we have significant member demand. If you want to procure an EAC that has not been verified by RE100 please check it against the criteria in the [“Making Credible Claims”](#) document.

4. Is there a vintage limitation for certificates?

Yes. To make a credible RE claim, the vintage of the energy attribute certificates must be “reasonably close” to the reporting year of the electricity consumption to which it is applied. There is however no official consensus on what is “reasonable” in this case, and it may vary between markets. RE100 does not have a specific vintage limitation.

Companies can refer to certification standards, claim verification and recognition programs, and/or GHG inventory reporting systems to ensure that the vintage of generation does not occur too far in advance or after consumption.

The Green-e® standard has a 21-month vintage requirement which RE100 recommends as a reasonable practice.

5. Can Energy Attribute Certificates (EACs) be used to green electricity generated consumed from a Combined Heat and Power (CHP) plant?

No. The practice of using EACs, which are scope 2 instruments, to offset Scope 1 electricity generation does not fit with established GHG reporting practice.

To green the electricity generated by a CHP plant you must do one of the following:

- switch to a renewable energy system,
- switch to a renewable fuel source such as biodiesel or biogas for onsite power generation, or
- purchase green gas certificates (e.g. ERGaR) from the same gas network

In case the company is contractually sourcing renewable electricity from the CHP plant through a grid transfer, the underlying electricity will be treated a purchased electricity. Company can use unbundled EACs to match with the electricity sourced from the CHP and claim RE consumption.

In the case where a company is making an active choice to procure electricity from an onsite CHP or other fossil fuel-based electricity generator, even if they have outsourced the operation or ownership of the plant, they cannot green it through the purchase of unbundled EACs for RE100. The company is choosing to have fossil fuel generation located on site for their use which is not a strategy that RE100 can support as a 100% renewable energy initiative.

MARKET BOUNDARIES

1. If a company has operations in many countries, is it allowed to source renewable electricity in one country or regionally to cover all of the operations?

No, RE100 has a [market boundary criteria](#). The renewable electricity used must be generated within the same market where it will be consumed.

This ensures that RE100 companies are creating demand and income for renewable electricity within the market in which they are operating and buying and consuming physical electricity. The “market boundary” refers to:

- a) an area in which the laws and regulatory framework governing the electricity sector are sufficiently consistent between the areas of production and consumption; and
- b) the existence of system-wide coordination between countries and the countries’ utilities or electricity suppliers recognize each other’s instruments.

In almost all cases, the market boundary is the country boundary, with the exception of North America (US + Canada) and most of Europe which are considered as “single markets”.

This means for instance:

- the electricity consumption of operations in Vietnam must be covered with renewable electricity generated in Vietnam and cannot be covered by electricity generated in China or Laos for instance
- the electricity consumption of operations in France can be covered with renewable electricity generated in Spain, as Europe counts as a single market.
- a claim in Ohio, USA could be made with renewable electricity from the USA or Canada

For more information, please refer to section 2.5 on Geographic Market Boundaries of the RE100 [Making Credible Claims](#) paper, and to the [document on market boundaries](#) which lists which countries RE100 considers as part of the single European market for renewable electricity.

2. Does RE100 have subnational market boundaries? For example, is ERCOT (Electricity Reliability Council of Texas) considered as a separate market by RE100?

No, RE100 does not have sub-national market boundaries. ERCOT counts as part of the USA and Canada market for RE100. RECs from Texas can be used to cover operations in the rest of the US and vice versa. This does not mean that companies should not consider these sub-national market differences in their procurement, only that RE100 does not have restrictions around this. Many companies follow more local procurement strategies to ensure that their renewable electricity that they are procuring has an effect on the electricity mix that they are consuming from their local grid.

3. What is the key difference between RE100 market boundary rule and CDP's market boundary rule (for its climate change information request)? Why?

The key difference between RE100 and CDP's market boundary rule is for Europe. For CDP, the market boundary for European countries only includes countries that are [members of the Association Issuing Body \(AIB\)](#). Please check more information about CDP's market boundary rule at [section 2.3 of the CDP Technical Note: Accounting of Scope 2 emissions](#). For RE100, the "European Single Market" is considered as a single market boundary. This includes countries from the European Union (EU-28), and European Economic Area (EEA). The full list of countries is available [here](#).

Guarantee of Origin (GO or GoO) is the tracking certificate regulated in the [European Directive 2009/28/EC, article 52](#). The GO is further standardized via the European Energy Certificate System (EECS) provided by the Association of Issuing Bodies (AIB). The EECS makes trade, cancellation and use of GOs standardized across Europe. This is a best practice evolved over time in Europe. Therefore, CDP adopted it as the basis to define market boundary for reporting use of renewable electricity market instruments in Europe.

The AIB aims to provide the infrastructure and information to support electricity source disclosure in all EU Member. Currently 26 European countries are full members of AIB, with 1 country have the applicant status and 2 countries have observer status. We anticipate more members will join AIB and will be able to transact GOs cross border (within Europe) through AIB hub. As a result, CDP's market boundary for Europe will expand as AIB membership grows in future.

We are aware that companies are facing issues in reporting to RE100 and CDP because of two different approaches adopted on market boundaries for Europe. We intend to align RE100's market boundary for Europe to AIB membership, so as to be the same as CDP's market boundary for Europe. When this change is implemented RE100 members will be given advanced notice and there will be a transition period. In the meantime, members can follow the respective guidance for reporting to RE100 and CDP (for its climate change information request) but are strongly encouraged to shift to following the CDP definition.

4. Does RE100 count AIB ex-domain cancellations?

Companies can do ex-domain cancellations for the GOs originated in AIB member states for use in non AIB country (or vice versa) within the European market boundary. Please see [here](#) for the RE100 market boundary.

Please note that ex-domain cancellations are not supported between AIB member countries, which always transfer GOs via the Hub for cancellation in the destination country, where this is technically possible. RE100 is aware that it is still not possible for consumers

to cancel GO's in all AIB member countries and in the case where a consumer unable to cancel in the AIB country of consumption and forced to cancel in another AIB country RE100 still accepts that renewable electricity claim.

RE100 does not accept AIB ex-domain cancelations for consumption outside of the RE100 European market boundary.

5. What about islands which are part of a country but do not share the same electricity grid (ex., Puerto Rico, an unincorporated territory of the USA). Do we have to buy renewable electricity from the specific island where we have consumption?

RE100 does not have subnational market boundaries and thus would allow a claim for a REC from the mainland USA being used for consumption in Puerto Rico, assuming that the rules of the REC system allow this. However, we also recognize that purchasing a REC in the mainland USA will have no impact on the electricity mix in Puerto Rico and thus don't recommend this as best practice.

6. What about nations made up of many islands (ex. Indonesia)? Do we have to buy renewable electricity from the specific island where we have consumption?

RE100 does not have subnational market boundaries and thus a company would not need to buy from the same island where their consumption is located in Indonesia. We recommend, however, that companies take into consideration the impact that their renewables purchases will have on their physical electricity supply.

7. Can I source electricity from China for operations located in Taiwan?

The political and legal statuses of Taiwan are contentious issues. However, when it comes to the electricity market and as far as the RE100 team is aware, there is no grid-interconnection between Taiwan and mainland China. In addition, relevant laws governing the electricity sector are distinct in both regions. Taiwan has its own RE market instrument known as T-REC, which is a valid RE market instrument for RE100 reporting. Additionally, Chinese Green Energy Certificate (GEC) are developed to be used only in mainland China.

Therefore, for RE100 you must use local market instruments such as T-RECs in Taiwan.

8. Will the UK be excluded from the European market boundaries as a result of Brexit? Should UK & EU be treated as two separate markets?

The UK and the EU are currently working on a new model of electricity trading. These arrangements are not in place yet. In the meantime, Great Britain and Northern Ireland will continue to issue REGOs and accept Guarantees of Origin (GoOs) from EU member states. This will allow electricity suppliers in the UK to continue to use REGOs and EU GoOs to comply with their fuel mix disclosure obligations. The latest updates on the topic can be found on [this website](#).

Also, upon the expiry of the transition period (In Dec 2020), EU laws relating to the promotion of the use of energy from renewable sources and energy efficiency generally will no longer be applicable in the UK. Therefore, it looks like the Guarantees of origin that have been issued by designated bodies in the United Kingdom in accordance with Article 15(2) of Directive 2009/28/EC will no longer be recognized by the EU Member States after the end of the transition period. Please check more details on the most recent notice from the European Commission [here](#).

RE100 is waiting for arrangements to be finalised before making any changes to the market boundary criteria. In case of further need for clarification or guidance, please seek local legal advice.

9. What should a company do when renewable electricity sourcing options are not available in a country of operation?

As a leadership initiative, we recognise that procuring renewable electricity in some countries/markets where member companies have operations, is challenging or impossible. However, depending on the size of the company, it can explore direct procurement contracts such as a PPA with a supplier, and secure renewable energy attributes contractually. Further, international certificate systems such as [I-RECs](#)² and [TIGRs](#)³ are available in many markets which provide reliable energy attribute tracking system.

If these options are not available, RE100 recommends that companies either investigate onsite (or near-site) renewable options, or that the company tries to aggregate demand with other companies in the same region to develop a solution.

In some cases, it will not currently be possible to buy renewable electricity and we recommend that companies work to support development of credible renewable electricity sourcing methods in that country. RE100 is happy to discuss opportunities to connect members in regions where RE is particularly challenging.

Renewable electricity is a fast-evolving sector, and we expect that those regions will have renewable energy sourcing options available in near future.

CONTACT

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² <https://www.irecstandard.org/about-us/>

³ <https://apx.com/about-tigr/>