

# Energy Cohort Roundtable BERDO Renewable Energy Requirements

*December 2, 2024*



# How can building owners use renewable energy to comply with BERDO?

Building owners can mitigate their building's electricity emissions\* by:

- 1 Enrolling into Boston Community Choice Electricity (BCCE) and choosing the “Standard” or “Green 100” Plan
- 2 Buying and retiring Mass Class I RECs (unbundled or bundled as part of a PPA inside ISO New England)
- 3 Entering a PPA outside ISO New England
- 4 Using local renewable energy generation

\* Renewable energy may not be used to mitigate emissions from fossil fuel use.

# 1 Enrolling into BCCE and choosing the “Standard” or “Green 100” plans

- **BCCE** offers two electricity services that exceed the Massachusetts RPS, enabling owners to reduce their emissions from electricity compared to the Eversource Basic Service.
- BERDO buildings that show BCCE Green 100 enrollment for a full calendar year for all electric accounts, would be considered to have zero emissions from their electricity usage.



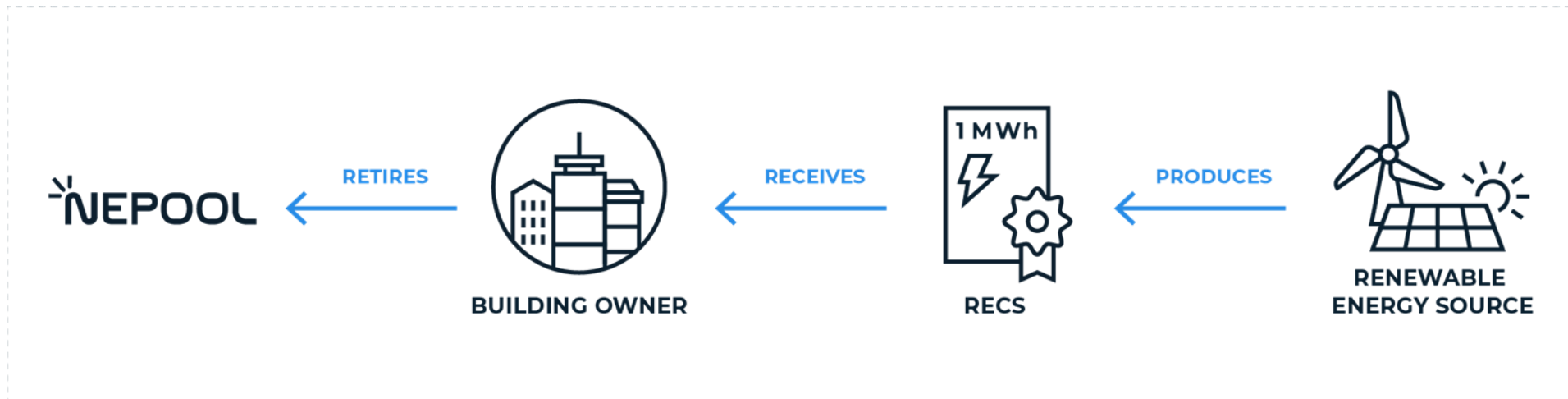
This example shows how electricity emissions change across the different BCCE plans for a building that uses 100,000 kWh for the 2025 calendar year\*

PLAN	ELECTRICITY USAGE (kWh)	% RENEWABLE ENERGY	ELECTRICITY EMISSIONS UNDER BERDO (kgCO <sub>2</sub> e)
<b>BASIC</b> (Opt-down)	100,000	27%	18,177
<b>STANDARD</b> (Default)	100,000	42%	14,442
<b>GREEN 100</b> (Opt-up)	100,000	100%	0

\* Electricity Emissions were calculated using the methodology shown in the BERDO Compliance Handbook, using the 2025 projected grid emissions factor of 0.249 kgCO<sub>2</sub>e/kWh and the 2025 Renewable Energy Portfolio Standard (RPS) of 27%.

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## Buying and retiring Mass Class I RECs (unbundled or bundled as part of PPA inside New England)



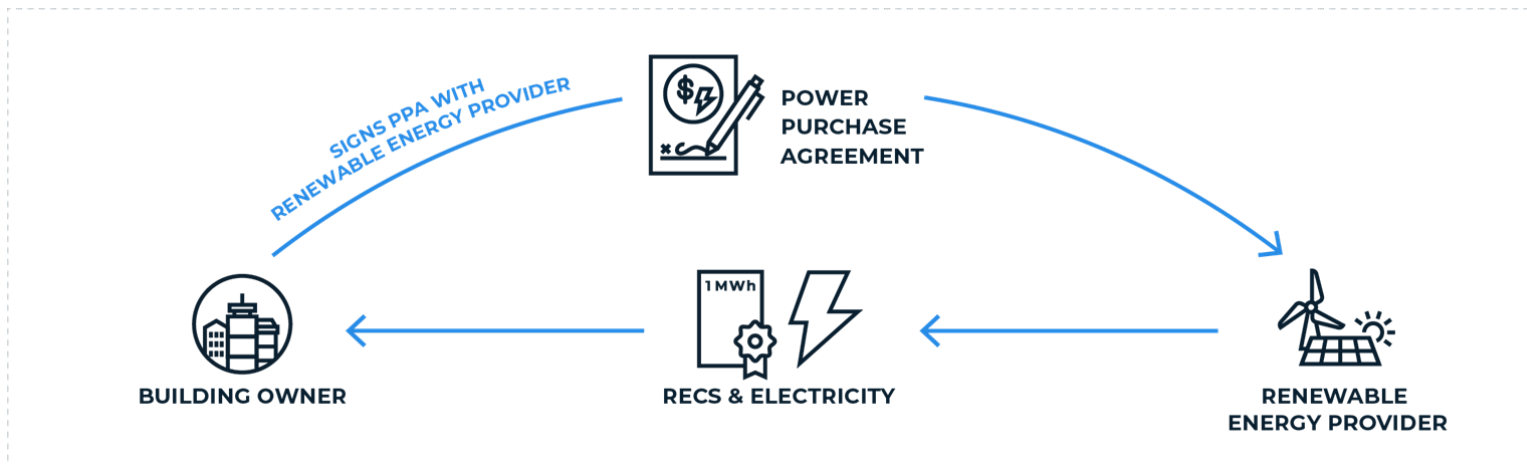
### Requirements for both unbundled and bundled Mass Class I RECs:

- RECs must be generated **within the compliance year or within the 12 months prior.**
  - For example, to use a REC to comply in 2025, the REC must have been generated any time between Jan 2024 and Dec 2025.
- RECs must be retired within **6 months of the end of the compliance year.**
  - For example, to use a REC to comply in 2025, the REC must have been retired by June 30, 2026.

For detailed methodology on calculating emissions compliance with REC purchases, please refer to our [BERDO Compliance Guide](#)

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## Entering a Power Purchase Agreement (PPA) outside New England



### Requirements for any PPA outside New England:

- Renewable energy facility must be connected to **any grid in the contiguous U.S. or Canada** (NERC).
- Building owners must buy both the electricity and its associated RECs (**bundled PPA**)
- PPA must meet **“additionality”**, i.e. it must be signed before commercial operation of the renewable energy facility.
- Electricity must be generated for the compliance year in which it is used.
- RECs must be retired within 6 months end of the compliance year for which they are used.
- RECs must meet Mass Class I RECs requirements except for location and metering.

# Approval of PPAs outside New England

## Application form

- Building owners or third-parties must request the Environment Department to **approve** PPAs outside New England (see [process in BERDO Compliance Guide](#)).
- Any PPA that is approved by the Environment Department is assigned a unique **PPA ID** number.
- **After PPA approval:** Following the approval of the PPA, Building Owners must simply reference the PPA ID in annual reporting and submit proof of retirement of the Renewable Energy Certificates associated with the PPA, including their date of generation and date of retirement.
- PPAs that meet BERDO requirements when signed can be used for compliance throughout the contract, including any extensions.

### **Please note that:**

- **A PPA cannot be approved or assigned a PPA ID until signed by at least one BERDO building owner.** Parties seeking advice on whether a prospective PPA meets BERDO requirements may contact the Environment Department by emailing [retrofit@boston.gov](mailto:retrofit@boston.gov).
- Based on extenuating circumstances, owners may request that the [Review Board](#) approve a PPA that does not meet the additionality criterion.

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# Using Local Renewable Energy



**On-site** non-emitting renewable energy generation systems (e.g., rooftop solar on a BERDO building)



**Off-site** non-emitting renewable energy generation systems (e.g., community solar, solar in rooftop leases, net-metering agreements with local generation facilities).

## WHEN CAN YOU USE LOCAL RENEWABLE ENERGY WITHOUT RETIRING MASS CLASS I RECS?

LOCATION	YEAR WHEN OWNER BEGAN RECEIVING NET METERING CREDITS:	
	BEFORE 2024	2024 AND AFTER*
<b>INSIDE BOSTON</b>	Eligible without REC retirement by BERDO building owner	Eligible without REC retirement by BERDO building owner
<b>IN EASTERN MA</b>	Eligible without REC retirement by BERDO building owner	Eligible <b>only if BERDO</b> building owner retires associated RECs

\* If solar system began operation after 2023 due to unforeseen circumstances or delays, consider applying for a [Flexibility Measure](#)

### THE DIFFERENT SET UPS OF SOLAR POWER:

- “Behind the meter”: Solar power first goes to the building, with any extra sent to the grid. Eversource reports net electricity usage on your bill, subtracting your solar production.
- “In front of the meter”: Solar power is sent to the grid for other customers to use. The company that makes the solar power sells “net-metering credits” to customers. If you buy these credits, they show up as money credits on your bill, and Eversource reports your total electricity use without including the solar energy.

# Overview



*In all cases, only non-emitting renewable energy can be used for compliance*

Renewable Energy Options	Key Requirements	Geographic scope or requirements
Boston Community Choice Electricity (BCCE)	MA Class I RECs purchased on behalf of residents and businesses enrolled in either the standard or Green 100 options of the BCCE program.	ISO New England grid
MA Class I Renewable Energy Certificates (RECs)	Unbundled MA Class I RECs bought and retired independently OR bundled MA Class I RECs bought and retired as part of a Power Purchase Agreement.	ISO New England grid
Power Purchase Agreement (PPA) outside the ISO New England grid	Energy contract requiring the purchase of <b>both</b> electricity and its associated RECs. This includes virtual PPAs.  PPAs need to be signed prior to the commercial operation of the renewable energy project (additionality requirement)	Any grid in the contiguous U.S. or Canada
Local renewable generation	Non-emitting renewable energy generation systems, either located on-site (e.g., rooftop solar in BERDO building) or off-site (e.g., community solar, solar in rooftop leases, Power Purchase Agreements)  REC retirement is not required if: (a) purchasing from solar system in Eastern MA that began operation before 2024; or (b) purchasing from any type of non-emitting renewable energy system located inside the City of Boston.	Eastern Massachusetts for solar installed before 2024  City of Boston for any system installed in or after 2024  Otherwise, MA Class I REC retirement is required.



# Renewable Energy Resources & Guides

## Relevant resources

- BERDO website: [boston.gov/berdo](https://boston.gov/berdo)
- Retrofit Resource Hub website: [boston.gov/retrofithub](https://boston.gov/retrofithub)
- [BERDO Compliance Guide](#)

### Quick Guides

- [Renewable Energy Quick Guide](#)
- [BERDO 101 Quick Guide](#)
- [Emissions Compliance Quick Guide](#)
- [PPA Outside New England Approval Application form](#)

# Updating renewable energy reporting in the BERDO Reporting Form

Renewable energy is currently reported through both Energy Star Portfolio Manager and the BERDO Reporting Form.

We will be updating our questions to improve data collection in the BERDO Reporting Form in 2025. Here are snapshots of how RECs, PPAs, and Local Renewable Generation are currently reported in the [form](#).

## REPORTING SOLAR NET-METERING AND GENERATION CREDITS TO BERDO

- We are working on creating guidance on how to report solar production and net-metering according to Eversource billing practices and data reporting.
- Send us examples of (redacted) Eversource bills at [retrofit@boston.gov](mailto:retrofit@boston.gov) and/or bills and reports of solar generation you issue to your clients

# Thank You!

Please visit [boston.gov/berdo](https://boston.gov/berdo) and [boston.gov/berdo-review-board](https://boston.gov/berdo-review-board) for more information and updates.

