Question 1. What should be the threshold for inclusion in the new program?
Submitter’s Name/Affiliation: Business Council for Sustainable Energy (BCSE)

- **How should a federal mandate interact with the 30 existing state electricity standards?**

The Business Council for Sustainable Energy (BCSE) represents a broad set of industry interests from the renewable energy, energy efficiency and natural gas sectors. As a diverse coalition, not all members take a position on (or endorse) the issue addressed in response to this question.

The interaction between state, regional and federal clean energy programs and policies are complex. BCSE members have long supported efforts at state, regional and federal levels to increase clean energy production, generation and use. Our members are especially focused on policies and incentives that deploy commercially-available technologies and resources. There are many clean energy options that are ready to be used, and that fit the diverse needs and priorities of states and regional jurisdictions.

State Renewable Portfolio Standards and State Energy Efficiency Standards are examples of market-based policies that can provide predictable market demand over a multi-year period of time. Such policies have created jobs and spurred investment across a range of technology sectors.

In the design of these programs, BCSE members seek consistency of program design, as appropriate, understanding the unique circumstances and preferences of states. Consistency in design areas, such as accounting metrics, are critical to ensure real and measurable achievement of program objectives and to create broader market signals for commercially-available clean energy technologies.

In addition, BCSE members favor market-based initiatives to spur deployment. Market-based programs enable lowest cost attainment of program objectives as well as the opportunity to incent entities to over perform and exceed goals.

With regard to a federal CES, the Council believes it should support state level initiatives that drive clean energy deployment and investment. As such, a CES should provide a floor, not a ceiling for state and regional standards. This is in contrast to nationwide minimum standards for federally covered consumer products, where state by state standards would balkanize a national market—state utility standards would not.

Further, a CES should consider offering flexibility to states that meet or exceed the federal targets. This will reduce costs and avoid duplicative rules.

Finally, a CES should ensure that it is driving real and measurable increases in clean energy deployment and it should safeguard against double-counting of credits and certificates among parties. This will require clear accounting rules as well as appropriate evaluation, monitoring and verification protocols.