December 14, 2021

Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Secretary Granholm,

On behalf of nearly 300 energy buyers, service providers, and energy providers that the Clean Energy Buyers Association (CEBA) represents, CEBA would like to congratulate the Biden-Harris Administration on the passage of the Infrastructure Investment and Jobs Act (IIJA). This is a significant win for many looking to advance the market and policy solutions needed to decarbonize the grid. As the Department of Energy (DOE) looks to implement many of the provisions included in the IIJA, CEBA looks forward to collaborating with the Administration by sharing the collective voice and experiences of the customer community.

The requirement for the Energy Information Administration (EIA) to collect more granular real-time data on emissions and resource mixes for all US electricity balancing authorities is particularly significant to CEBA members. Energy customers have deployed over 44 gigawatts (GWs) of renewable energy since 2008 and last year alone contracted for 10.6 GW. However, the lack of access to precise and reliable GHG emissions and energy data is a critical impediment to enabling customers to drive greater progress and maximize the decarbonization impact of their energy procurement decisions.

With access to more granular emissions data, energy customers can better target clean energy procurement and operations towards the times and places of greatest decarbonization impact. In addition, more granular data on resource mixes can help customers to efficiently meet ambitious goals that require matching electricity consumption with clean energy resources on a local and temporal basis. Publicly providing this data through an easy-to-use platform can help all energy customers to understand and manage the emissions impacts of their usage.

Successful enactment of these provisions requires collaboration to align on approaches for standardization and transparency across balancing authorities. CEBA requests the following from DOE and EIA:

- Ensure EIA is adequately resourced to execute this mandate and conduct a robust stakeholder engagement process to collect input and feedback from a range of stakeholders
- Leverage the expertise of energy customers to understand the impact and importance of this level of data in supporting customer procurement strategies
- Provide transparent information and technical analysis around proposed methodologies and approaches for collecting data and related information from electricity balancing authorities and LSEs.

CEBA respectfully requests a meeting to share customer perspectives and experiences to support the implementation of these critical IIJA provisions.

Sincerely,

Miranda Ballentine
CEO, Clean Energy Buyers Association