

RESPONSE TO PUBLIC COMMENTS



The ACR Standard Version 3.0 was posted for public comment from December 5, 2013 to January 5, 2014. Public comments and responses are documented below.

	Public Comment	ACR Response
Introduction, Applicability	This section provides that any project listed or registered prior to April 1, 2014, may be validated and verified according to <i>ACR Standard v2.1</i> through the end of the Crediting Period. Given that ACR is only publishing v3.0 in February 2014, would you consider extending the listing/registration date for projects that will use v2.1?	Yes, we will extend that deadline by two months to June 1, 2014.
Chapter 8, Section F. Rotation of verification bodies	ACR requires that Project Proponents utilize a different verification body at a minimum of every five years or five verifications, whichever comes first. We would like to suggest that the timeframe be revised to be consistent with ARB regulations stating that the OPO must utilize a different verification body every six years or verification, whichever comes first.	The ARB verifier rotation of 6 years is presumably intended to line up with 3 year compliance periods (ie: rotation of VB at a minimum every two compliance periods), whereas ACR's five year rotation is intended to be consistent with our verification interval of minimum 5 years.
General	We would like to suggest that ACR provide timelines for review of a project before issuance of ROCs or early action credits. It is helpful to know that ACR has a timeframe for project review.	Please note that the ACR Standard does not govern CA compliance-eligible projects, only voluntary market projects. Our timeline for issuance of ROCs is governed by the regulation, and we follow the same timelines for early action projects. We strive to be responsive and generally review voluntary projects within 2-4 weeks and verifications within 1-2 weeks if not sooner in both cases. However, these timelines depend on many factors, including regulatory deadlines for compliance projects, and therefore we prefer to not place fixed timelines on reviews of voluntary market projects. We will always do our best to accommodate the timing requirements of all projects, in particular to those subject to contractual obligations for delivery.