

The Department of Energy & Environment (DOEE) Responds to Q&A from the DCSEU's Energy Benchmarking Webinar

Official answers from the Building Performance & Enforcement Branch at DOEE to questions from attendees of the Introduction to Energy Benchmarking webinar on Sep. 2nd, 2020 hosted by the DCSEU and presented by Baumann Consulting.

Q:1 Does the BEPS 50,000 sq ft rule apply for an entire property or a single building?

A:1 BEPS applies to properties over 50,000 square feet. For example, two buildings that are both 30,000 square feet but share a common meter or are connected functionally in some way would be considered a 60,000 square foot property for the purposes of BEPS. On the other side if those same buildings were metered separately and do not share common functions then they would not be covered in the first BEPS Period.

Q:2 For buildings that are 70+ years old, meeting these requirements can be very difficult. Are there resources that can help us meet these requirements without breaking the bank? Are we able to reach out to experts at DOEE to help guide us with meeting these requirements?

A:2 Typically, DOEE has not found that there is a relationship between building age and energy performance. In fact, some studies have suggested that older buildings are inherently more efficient than modern buildings. What tends to most impact energy performance is the actual energy systems in the building. For assistance in replacing existing systems to improve energy performance DOEE recommends reaching out to the DCSEU to explore current incentive offerings. Additionally, DOEE is working closely with the DC Green Bank to ensure that there are financing options for buildings seeking to comply with BEPS. Finally, DOEE maintains an open help center for building owners, operators, occupants, and service providers to ask questions of DOEE staff. For more information please see our website: <https://doee.dc.gov/page/get-help-benchmarking>

Q:3 Can a 3rd party benchmarking service become certified to verify benchmarking as well for other properties?

A:3 DOEE does not have requirements for third party verification at this time but plans to release information later this year. More information will be posted to our website: <https://doee.dc.gov/node/17362>

Q:4 As an owner, we can put various efficient systems in place to reduce energy consumption, but we cannot control what residents do or use inside their units, especially if they pay their own utility bills. How do we prevent from being unfairly penalized?

A:4 DOEE understands that the split incentive is a common problem for a lot of multifamily buildings. We highly recommend building owners look at existing resources on [green leases](#) and incentive programs like the DCSEU and the [Fannie Mae Green Rewards Program](#). We also recommend owners and landlords talk with their tenants about BEPS to make sure they are aware and work out a plan to achieve the requirements.

Q:5 Is there an RFI for data verifiers?

A:5 DOEE does not have requirements for third party verification at this time, but plans to release information later this year. More information will be posted to our website: <https://doee.dc.gov/node/17362>

Q:6 Yes, I understand you are currently creating minimum qualifications for data verifiers. My organization administers an energy certification that qualifies for energy audits and data verification under similar energy benchmarking ordinances across the country. I want to make sure my certified professionals are included. (How do I make sure I'm included in those communications?)

A:6 DOEE does not have requirements for third party verification at this time but plans to release information later this year. More information will be posted to our website: <https://doee.dc.gov/node/17362>

Q:7 I understand we might be able to "back out" the tenant utility portion and just report the "building" portion that we can actually control, but if there is one meter for the entire 300 unit building I cannot see that happening. (what if a building is master metered with no sub meters though? Owner pays all utilities.)

A:7 Whole building data is required for compliance with the District's benchmarking law, including all common areas, tenant-controlled areas, and residential living units. Building owners may not exclude any energy loads from their building unless explicitly told by DOEE, and DOEE will reject reports that are missing whole building data. Buildings that are master metered should just report what is present on their meter. Buildings that are not master metered can request whole building aggregated data from Pepco and Washington Gas. For more information please see our website: <https://doee.dc.gov/node/563822>

Q:8 How are solar systems and or non-traditional heating/cooling sources such as VRF accounted for? I do not see those systems for entry within energy star.

A:8 We assume this is referring to solar hot water. For non-traditional heating/cooling sources ENERGY STAR requires that you only account for the input energy to these systems. For example, a solar hot water heating system should only report the electricity consumed by the pumps that operate the system and any other electrical consumption associated with the system. For solar PV EPA has extensive guidance on how to account for this [here](#). More information on non-traditional heating/cooling please see EPA's Website: <https://portfoliomanager.zendesk.com/hc/en-us/articles/213913418-Which-solar-or-geothermal-energy-needs-to-be-metered->

Q:9 Also in the example of the owner pays for the water, and the building is on one meter (very old building), even with educating the residents, how is it possible to control the use of the tenants as we have no idea who is creating the high usage? Metering each unit, 200+ units in a historical building, is very costly. Is part of your energy initiative to provide owners with funds to help ease the financial pain of meeting these new requirements?

A:9 DOEE is not requiring submetering of each individual unit under the benchmarking or BEPS mandates. However, DOEE does understand that the split incentive is a common problem for a lot of multifamily buildings. We recommend building owners to look at existing resources on [green leases](#) and incentive programs like the DCSEU and the [Fannie Mae Green Rewards Program](#). We also recommend owners and landlords talk with their tenants about BEPS to make sure they are aware and work out a plan to achieve the requirements.