

**From:** [Bruce Shapiro](#)  
**To:** [Secretary, BPUBoard \[BPU\]](#)  
**Cc:** [BPUenergyefficiency \[BPU\]](#)  
**Subject:** [EXTERNAL] NJ Realtors Comments on Building Energy Benchmarking  
**Date:** Friday, January 14, 2022 1:57:29 PM  
**Attachments:** [image001.png](#)

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January 13, 2022

Aida Camacho-Welch  
New Jersey Board of Public Utilities  
P.O. Box 350  
Trenton, NJ 08625

Dear Board Secretary Camacho-Welch:

On behalf of the approximately 63,000 New Jersey Realtors<sup>®</sup>, I am writing to formally submit our comments in response to Docket No. Q021071023, concerning the implementation of P.L.2018, c.17, regarding the Energy and Water Benchmarking of Commercial Buildings.

New Jersey Realtors<sup>®</sup> participated in the January 6, 2022 BPU Stakeholder Meeting to discuss the New Jersey 2021 Building Energy and Water Benchmarking Straw Proposal. After participating in this meeting, New Jersey Realtors<sup>®</sup> would like to thank the BPU staff for holding this meeting and for several of the comments made by staff that day indicating the BPU would be permitting commercial buildings with 4 or fewer units to opt out of energy benchmarking, which NJ Realtors<sup>®</sup> believes is appropriate due to their size and the impacts benchmarking could have on smaller building owners and tenants. New Jersey Realtors<sup>®</sup> is also supportive of excluding residential properties from energy benchmarking as indicated during the January 6 meeting.

New Jersey Realtors<sup>®</sup> is also supportive of the comments made by the BPU staff during the January 6 meeting concerning transactional disclosure of energy benchmarking reports that this is not being recommended at this time (discussed during Stakeholder Question #9 at the aforementioned meeting.) New Jersey Realtors<sup>®</sup> believes this is appropriate so as to not make it harder to sell or lease certain commercial buildings in New Jersey.

Lastly, as discussed on the January 6 meeting concerning the BPU reaching out to certain industry groups to hold educational sessions later in 2022 to discuss energy benchmarking,

New Jersey Realtors® would be happy to work with the BPU at such time that these sessions begin.

Thank you for taking the time to review our comments and please do not hesitate to contact me any time at (609) 341-7113 or [bshapiro@njrealtor.com](mailto:bshapiro@njrealtor.com).

Sincerely,

Bruce S. Shapiro  
Director of RPAC & Regulatory Affairs  
New Jersey Realtors®

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