

## Building Benchmarking Policy Proposal and Implementation Comments

**TO:** New Jersey Board of Public Utilities, Division of Clean Energy

**FROM:** Willdan

**DATE:** 1/20/2022

**SUBJECT:** Building Benchmarking Policy Proposal and Implementation Comments

### *1. Staff requests stakeholder comment on the proposed definition of “commercial buildings.”*

It is unclear what the difference between “multifamily residential” and “apartments” regarding what is included and not included. Willdan suggests this distinction be clearly defined, and to potentially rely on the 25,000-sf minimum size to demarcate between which multifamily housing is required to be benchmarked, and which is not.

It is unclear why public buildings are exempt. Public buildings often are the first to be required to benchmark so that government is leading by example.

### *2. Staff seeks stakeholder feedback on which buildings should be excluded from the covered buildings list, how campuses should be treated, and why.*

Campuses should be benchmarked at the granularity that they are metered. Many campuses have one meter for the entire campus, while others have separate electric meters for each building but use district heating that is not separately metered. Ideally the benchmarking should allow each fuel stream to be benchmarked separately.

The criteria for benchmarking campus buildings should be the same for other buildings, 25,000 sf per building when they are separately metered. Campuses with a single master meter would need to include all building area under that master meter.

### *3. Staff recommends an appeal process to have buildings removed from the covered buildings list and seeks stakeholder feedback on criteria for granting appeals.*

Willdan recommends the program defines “newly constructed” as being specific to buildings that have been initially occupied during the 12 months of the benchmarking period. This definition will help to avoid claims that a building 18 months or 24 months since initial occupancy is “newly constructed.”

### *4. Staff requests stakeholder feedback about the proposed data access approach, privacy and cybersecurity concerns about building owners and building operators accessing tenant data, and eligibility requirements for opt-outs based on privacy and cybersecurity concerns*

Data security and tenant privacy policies are reasonable and in line with other jurisdictions that require benchmarking. By having the utility aggregate whole building usage, the concerns of identifiable tenant data should be minimal.

### *5. Staff requests stakeholder comment on the utility implementation of data access and web services and other available options that would be secure and efficient and would streamline data upload for building owners/operators.*

Willdan recommends that the data should be provided monthly or quarterly to increase the value of benchmarking. Having monthly data available will allow building owners to respond more quickly if a building starts to use more energy or is not on track to meet their energy goals. Additionally, analytics that break out the annual benchmark number to monthly data reports are valuable because it gives owners a better understanding of how their building is doing on a consistent basis rather than just the previous year.



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- 6. Staff seeks stakeholder feedback on best strategies and recommended approaches for outreach to ensure that all commercial building owners and operators are aware of the benchmarking requirement and its benefits.**

Provide benchmarking webinars to groups like Building Owners and Management Association (BOMA), International Facility Management Association (IFMA), Global Facility Management Association (Global FM), Facility Management Institute (FMI) and Association of Asset Management Professionals (AMP).

- 7. Staff seeks stakeholder feedback about what training content, media, and platforms would be useful to provide building owners and operators, as well as for any other entities.**

A clear step by step set of instructions with screenshots would assist customers in enrolling.

- 8. Staff recommends developing a Portfolio Manager certification program with the assistance of New Jersey Institute of Technology's ("NJIT's") Center for Building Knowledge and seeks feedback on how it might be implemented.**

The terminology should be clearly defined so that it does not imply that the Portfolio Manager certification is equivalent to a building earning an Energy Star certification.

- 9. Staff seeks stakeholder feedback on a public reporting approach that takes into account public awareness and transparency goals, privacy considerations, and minimization of cybersecurity risk.**

Willdan suggests that the public dashboard that provides Energy Use Intensity for each building should provide the Energy Star Portfolio Manager (ESPM) score as well (when available). Many buildings will be ineligible for ESPM scores due to not being one of the 20 supported building types. Supplementing ESPM scores with other benchmarking approaches would assist in providing everyone with a score. Displaying weather normalized year over year trends for each building would also allow stakeholders to see which buildings are improving, and which may be using more energy.

- 10. Staff seeks feedback on how to optimize reporting compliance.**

The initial challenge will be to get owners to enroll their buildings. With automated data provided by the utilities, compliance in subsequent years should be simple. A public dashboard showing which buildings are out of compliance and direct communication with the owner are helpful. Outreach and education for potential tenants to use the dashboard and inform their decisions on where to lease could encourage compliance through market pressures. Requiring compliance to participate in any BPU incentive program would also encourage compliance. Ultimately, penalties or other mechanisms that discourage non-compliance may be needed to get beyond 50 or 75% compliance.

- 11. Staff seeks suggestions about how to design the benchmarking program so as to potentially be able to expand in future years (e.g., by accommodating additional buildings, etc.) and form the foundation for future efforts in increasing energy efficiency in buildings.**

Competitions rewarding and publicizing most improved buildings or performance-based grants would encourage growth of the program and highlight the benefits of benchmarking.

- 12. Staff seeks comments on additional elements of the benchmarking program that would maximize its benefits.**

Analytics that provide benchmarks for a wider range of buildings, the ability to disaggregate heating, cooling, and baseload driven energy consumption, monthly benchmarking would provide owners with more actionable information. This would allow owners to improve their buildings and track if they are savings the expected energy after making the improvements.

