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## DDOE Energy Benchmarking: Frequently Asked Questions (F.A.Q.)

### BENCHMARKING – GENERAL

#### **1. What is energy benchmarking?**

Energy benchmarking means tracking a building's energy and water use and using a standard metric to compare the building's performance against past performance and to its peers nationwide. These comparisons have been shown to drive energy efficiency upgrades and increase occupancy rates and property values. Utility data is interpreted by linking it to building's characteristics that relate: size, number of occupants, common uses, even localized weather patterns. These details provide a context for the energy and water consumption thus making comparisons over time or with other buildings of the same type much easier. The District of Columbia has chosen ENERGY STAR® Portfolio Manager, a free software tool developed by the U.S. Environmental Protection Agency, for benchmarking both private and public buildings in the city.

#### **2. What is the District of Columbia's benchmarking law?**

Benchmarking of private buildings over 50,000 square feet and public buildings over 10,000 sq. ft. is required by the Green Building Act of 2006, as amended by the Clean and Affordable Energy Act of 2008. These acts were enacted to encourage widespread understanding of energy and water use patterns throughout the District and provide an incentive to pursue reductions in costs and resource use. Building owners will benchmark their buildings annually using ENERGY STAR® Portfolio Manager.

Please see below for the schedule of when each building size must first report. DDOE will begin publishing benchmark results after the second year of reported data for each building size group.

Portfolio Manager can be accessed at [www.energystar.gov/benchmark](http://www.energystar.gov/benchmark). To read more about the Clean and Affordable Energy Act and the benchmarking regulations, please visit [www.ddoe.dc.gov/energybenchmarking](http://www.ddoe.dc.gov/energybenchmarking). Implementing regulations are found in section 3513 of the DC Municipal Regulations, Title 20, Chapter 35.

#### **3. Why is the District requiring building benchmarking?**

Buildings represent 75% of the District of Columbia's energy consumption and carbon emissions. Therefore, any plan to reduce the District's energy use or greenhouse gas emissions must address buildings.. Currently, information on how buildings use energy or water is scarce and only available as a District-wide picture. The District is requiring building benchmarking so that building owners and tenants can become more aware of how much energy and water is being used in their buildings, and can make more informed investment decisions. Moreover, the public disclosure of energy performance data will bring transparency to energy consumption and create market pressure for more efficient buildings. Market actors, including potential tenants or

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buyers, will be able to compare the performance of buildings, and better-performing buildings will be rewarded with more business, and owners will in turn improve the efficiency of their buildings to improve competitiveness, creating a positive feedback loop of continuous improvement.

### **4. How much does it cost to benchmark a building?**

ENERGY STAR Portfolio Manager is a FREE online service available to building owners through the US EPA. Soft costs to building owners will include the time needed to collect energy and space use data and to set up a building account. The time to set up a building account is dependent on a number of factors such as: the number of spaces, access to building use information (e.g., operating hours, number of tenants) and access to building plans to assign square footage to usage types (e.g. retail, office or parking). Once all the data is collected, existing staff can benchmark a portfolio of buildings in a couple of hours.

### **5. Do I need to hire a qualified contractor to benchmark the building?**

No, the intent of the program is make benchmarking accessible to building owners who choose to do their own benchmarking with existing staff and resources. A Benchmarking Help Center is available by calling (202) 525-7036 or emailing [benchmarking@dcseu.com](mailto:benchmarking@dcseu.com) to provide additional educational support. Independent, third-party verification is required ONLY if the building owner chooses to register for ENERGY STAR certification, which is NOT being required by the District.

### **6. Will the results of my benchmarking be made public?**

Yes. District law requires that DDOE makes the results of your building's benchmarking public following the *second year of reported data*. Results will be reported on DDOE's website, [www.ddoe.dc.gov](http://www.ddoe.dc.gov). Building owners of record and building addresses will also be reported, but no personal contact information and no financial information will be available to the public.

## **PORTFOLIO MANAGER**

### **7. What is Portfolio Manager?**

Portfolio Manager is a free, secure, web-based benchmarking tool developed and maintained by the U.S. Environmental Protection Agency (EPA). The program calculates a 1-100 performance rating for [15 different building types](#) using a building's energy use, water use, and characteristics (e.g. size, type(s) of use, number of occupants, etc.) This score allows building owners to evaluate their building's performance based on scores of similar buildings nationwide. Nationally, Portfolio Manager has become the industry-standard benchmarking tool; over 250,000 buildings have been benchmarked using Portfolio Manager since its inception in 1999, representing over 27 billion square feet, and 40% of the entire commercial building market. Many of the District's building owners already track utilities of their buildings with Portfolio Manager and employed it to gain ENERGY STAR® certification for their buildings. To find out more about Portfolio Manager go to: [www.energystar.gov/benchmark](http://www.energystar.gov/benchmark).

### **8. What is an EUI?**

Once utility information and basic building characteristics are entered into Portfolio Manager software, the tool calculates the building's Energy Use Intensity (EUI). EUI refers to the energy use of the building per square foot. In Portfolio Manager, it is expressed in kBtu/sq ft (thousand British Thermal Units per square foot; Btu is a standard measure of energy that fuel-specific units, such as kilowatt-hours or therms, can be converted into). Portfolio Manager normalizes the EUI for local weather patterns using data from the National Oceanic and Atmospheric Administration; this allows the comparison of your building's performance to buildings of other cities, and allows you to easily make year-on-year comparisons of your energy use. EUI can be expressed as site EUI or source EUI (see below).

### **9. What is “source energy” and “site energy”?**

Source energy is defined as the total amount of raw fuel required to operate the building(s). It incorporates all transmission, delivery, and production losses to create a complete assessment of energy efficiency of the building(s). ENERGY STAR performance ratings evaluate buildings that use all types of energy.

Site energy is the total amount of energy in kBtus consumed at the actual building address. This metric will only account for amount metered and consumed on-site. Source energy allows appropriate comparison between electricity from the grid, with natural gas or other fuels that are burned onsite. For more details, consult EPA's website:

<http://www.energystar.gov/sourceenergy/>

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### 10. What is the ENERGY STAR score?

If your building falls into one or more of the 15 building categories then Portfolio Manager will automatically compare the normalized EUI to the national dataset of that category or mix of categories. Your building then receives a score between 1 and 100. A score of 50 indicates your building is performing at the national average for that building type. A building that has a score of 80 performs in the top 20<sup>th</sup> percentile of energy performance nationwide, better than 80% of comparable buildings, while a building with a score of 35 is in the bottom 35<sup>th</sup> percentile. The score provides a standardized way to compare one building against another.

### 11. How do I access and use Portfolio Manager?

Portfolio Manager is free and easily accessible at EPA's energy benchmarking site [www.energystar.gov/benchmark](http://www.energystar.gov/benchmark). The easiest way to get started is to download the [Portfolio Manager Starter Kit](#). If you are new to Portfolio Manager, it is best to take a webinar training for Portfolio Manager before starting actual benchmarking, or, if available, attend a live training session provided by the DC Sustainable Energy Utility.

### 12. To create a Portfolio Manager account, go to [www.energystar.gov/benchmark](http://www.energystar.gov/benchmark) and click on the "New User? Register" Link. You will then fill out an Account Information form and complete the requested information, and your account will be created. **What is the difference between LEED and ENERGY STAR®?**

ENERGY STAR® is a U.S. Environmental Protection Agency (EPA) program that focuses on improving energy performance in buildings as a method of reducing greenhouse gas (GHG) emissions. Leadership in Energy and Environmental Design (LEED) is a green building certification offered by the non-profit U.S. Green Building Council (USGBC).

ENERGY STAR® is a technical assistance and recognition program that offers owners and managers of all buildings access to free tools and resources to help them evaluate their energy performance and reduce energy use and GHG emissions. Organizations are encouraged to begin by benchmarking the performance of their buildings using the Portfolio Manager online tool. For certain types of buildings that perform in the top 25% compared to their peers nationwide, the ENERGY STAR® label is available as an indicator of superior energy performance. Buildings carrying this label consume on average about 35 percent less energy than their non-labeled counterparts. The label is not automatic; to earn the label, building owners must apply to EPA by submitting a Statement of Energy Performance, validated by a Professional Engineer or Registered Architect. The District is NOT requiring any buildings to become ENERGY STAR® labeled.

LEED is a building certification process that looks at various aspects of "green building" and awards recognition to buildings that meet certain standards. Users of the LEED process earn



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credits in several categories associated with green buildings. These differ by the type of LEED certification, but generally include: sustainable sites, water efficiency, energy & atmosphere, materials & resources, indoor environmental quality, and innovation. While each category may have required prerequisites that must be met, for the bulk of the credits required for certification users can choose the categories that they wish to focus on based on their own priorities. Energy efficiency may or may not be one of those priorities, depending on the user. It is possible for a LEED-certified building to use energy inefficiently; however, USGBC has started to require that buildings seeking certification meet a minimum energy performance standard based on the ENERGY STAR rating system in addition to having enough credits overall.

### **13. I am purchasing green power generated and delivered by my local utility. Will this improve my 1-100 score?**

Purchasing green power will reduce your overall greenhouse gas emissions, which will be also made public, but it may not improve your score. The ENERGY STAR<sup>®</sup> rating is a measure of the thermodynamic performance of your building, which is determined by the amount and type of fuel your building consumes. The rating is designed to reflect the energy efficiency of the building overall. Generating renewable power on-site will dramatically increase your score since it bypasses the significant transmission losses of the local grid. Since green power purchases must still travel through the local grid much of the same losses apply which leaves the source EUI unchanged.

### **14. Where can I find Portfolio Manager trainings?**

If you are new to Portfolio Manager, it is best to attend a live training session by the [DC Sustainable Energy Utility](#). More information is available at [www.dcseu.com](http://www.dcseu.com). If that is not possible, then viewing a live or a recorded webinar training before actual benchmarking is beneficial. The EPA offers live and pre-recorded ENERGY STAR<sup>®</sup> webinars. More information is available at [www.energystar.gov/benchmark](http://www.energystar.gov/benchmark); follow the 'Training' link. Information about trainings in DC can be found at [www.ddoe.dc.gov](http://www.ddoe.dc.gov).

If you need technical assistance with a particular aspect of Portfolio Manager, you can contact the DC SEU Benchmarking Help Center Hotline at 202-525-7036 or [benchmarking@dcseu.com](mailto:benchmarking@dcseu.com). The hotline is intended as a technical support line for specific questions, and does not provide a substitute for the detailed trainings discussed above.



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### DETERMINING APPLICABILITY AND COMPLIANCE

#### 15. Is my building required to benchmark, and what are the deadlines for reporting?

By 2014, all commercial and multifamily buildings over 50,000 gross square feet (gsf) will be required to report benchmarking data to the District on a yearly basis. Below is the schedule of initial reporting deadlines, which phase-in based on building size.

Building Size (gsf)	Utility Year Data	Deadline
200,000+	2010, 2011	March 19, 2013*
150,000-200,000	2011	March 19, 2013*
100,000-150,000	2012	April 1, 2013
50,000-100,000	2013	April 1, 2014

*\* Due to delays in the finalization of DDOE's implementing regulations, the initial compliance deadline for all buildings over 150,000 gsf has changed from what is indicated in the law. Pursuant to subsection 3513.15 of the final rulemaking, the deadline for 2010 and 2011 data is March 19, 2013, 60 days after the publication of the final rulemaking. However, to reduce confusion and ease the regulated community's compliance with the regulation, **DDOE will allow the submission of 2010 and 2011 data through April 1, 2013.***

The requirement applies to both residential and non-residential private buildings. District -owned public buildings over 10,000 gsf have been required to be benchmarked since 2009. Federally-owned public buildings are not covered, as they are not subject to District laws.

Owners should plan to start collecting information for their buildings for the previous year by February of the year they are to report, to allow sufficient time to receive and enter information. To ease compliance, buildings over 150,000 gsf are subject to more limited reporting requirements for calendar years 2010 and 2011. For more information, see question 29 of this FAQ and the *2010-2011 District Data Collection Worksheet*.

After the initial reporting year, buildings should continue to report each year by April 1<sup>st</sup> data for the previous calendar year.

#### 16. Why are residential properties required to benchmark?

Section 4(c) (D.C. Official Code § 6-1451.03) of the Green Building Act (GBA) states that the requirements for energy benchmarking “shall apply to all buildings and projects that are of a building type for which Energy Star® tools are available.” No distinction is made between

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residential and non-residential properties. Section 4(c)(2) of the GBA refers to “privately-owned buildings,” and makes no distinction between residential and non-residential buildings, whereas other sections of the GBA, such as section (4)(b), specifically limit their applicability to non-residential buildings only..

### 17. How do I know if I must submit a benchmarking report to DDOE?

DDOE will post a list received from the Office of Tax and Revenue (OTR) detailing the gross square footage and building address for all buildings required to comply in the city. Please look up your building on that list to see if you will be expected to report.

### 18. What is a Unique Building Identification Number?

The Building Identification Number is the number that uniquely identifies your building in the District’s records. Generally, it is the Square-Suffix-Lot (SSL) number from your District of Columbia Property Tax Records. For condominiums, it is the Square-Suffix-Regime (SSR) number (Every condominium is assigned a four-digit unique “regime” number by the District government.) DDOE has posted to our website a list of all Building ID numbers that have square footages larger than the threshold established in the regulation to [www.ddoe.dc.gov](http://www.ddoe.dc.gov).

The Building Identification Number must be entered into Portfolio Manager in the *Unique Building Identifier* field in order to ensure your building is registered as being in compliance. If your building or property covers multiple tax lots/parcels, *and is not a condominium*, enter all applicable Building Identification Numbers in the Building ID field.

### 19. How do I calculate the square footage of my building? What spaces should I include?

The square footage entered in Portfolio Manager is the gross floor area, meaning the total floor area, for your building. The total square footage must include all supporting functions such as lobbies, stairways, restrooms, storage areas, elevator shafts, etc.

If you are unsure of your building’s square footage, you can consult architectural plans or the Office of Tax and Revenue CAMA database at [www.data.dc.gov](http://www.data.dc.gov). In the CAMA database, the total gross building area (GBA) of residential buildings does not include garages; for commercial or mixed use buildings, garages are included as part of the total GBA.

### 20. Does parking space count towards compliance? Should it be benchmarked?

Parking is considered a secondary space and does not count towards the thresholds for compliance with District regulations. However, garages that are metered as part of the building do need to be included when benchmarking the building in Portfolio Manager because the energy used in garages and other secondary spaces contributes to the energy use of the building. If you

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do not include the square footage of garages then the building's calculated Energy Use Intensity and corresponding score will appear more inefficient to the public.

### **21. I received a letter from the District indicating I must submit a benchmarking report, but I do not think my building is covered. What should I do?**

If you have only one building on the lot, and you think that the actual square footage of the building is less than OTR says it is, such that it falls below the size thresholds, please contact DDOE at [info.benchmark@dc.gov](mailto:info.benchmark@dc.gov) and explain your situation. You may be required to submit copies of building plans to support your case. If your lot has multiple buildings on it, none of which meet the size threshold, you may still be covered by the law; see the question below for more information on multiple building situations. If your concern is that your building cannot receive a 1-100 score, you must still report.

### **22. I have multiple buildings on my lot. How should I benchmark them?**

If your property has meters shared across multiple buildings, or building systems (such as a central gas furnace) shared across multiple buildings without sub-metering, then the energy use cannot be attributed to any individual building. As a result, they cannot be independently benchmarked, they should be benchmarked as one building or campus, and the threshold for compliance will be the combined floor area of all the primary spaces served by a single meter with no sub-metering.

If the buildings are separately metered for all energy utilities, they should be benchmarked as separate buildings and the threshold will apply to the size of each building individually. If a water meter is the only shared meter then the buildings should still be benchmarked as separate buildings, and the water use should be pro-rated based on gross square footage. This is because water use does not affect the EUI or score. This guidance may change if EPA introduces a score for water efficiency in the future. When benchmarking multiple buildings on a tax lot separately, use the same SSL/SSR/parcel number for multiple buildings.

DDOE will make initial mailings to building lots as listed in the Office of Tax and Revenue records. If a building owner believes that a complex of buildings is not subject to the law (either at a given size threshold or at all), the owner should contact DDOE at [info.benchmark@dc.gov](mailto:info.benchmark@dc.gov) and submit signed, supporting documentation demonstrating the gross floor area of the buildings and that are separately metered for all utilities.

How you benchmark multiple buildings with shared systems depends on the types of buildings:

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- If the buildings on the campus are all of the same type (such as a walk-up apartment complex) they should be aggregated together as a single “building.”
- For hospitals and K-12 schools, the buildings should all be aggregated together as one “building,” because the score designation for hospitals and schools applies to hospital campuses.
- For complex campuses with many building types, they should be grouped as a “campus,” with any utilities metered at the building (or smaller) level assigned to that building and any shared utilities assigned to the campus. Campuses benchmarked in this way cannot receive a 1-100 score, and also have specialized procedures for submitting data to DDOE, as elaborated below. When in doubt, DDOE recommends that grouping as a single property rather than a campus.

We anticipate that campus submission will be able to use the same custom reporting template as all other submissions once the new version of Portfolio Manager is released in summer 2013.

Note that these guidelines are based on EPA’s best practices for benchmarking in ENERGY STAR Portfolio Manager; they apply identically whether one tax lot or multiple tax lots are involved. If your building or property covers multiple tax lots/parcels, enter all applicable Building Identification Numbers in the Notes field, separated by commas.

### **23. My building is not of a building type that can receive a 1-100 score in ENERGY STAR Portfolio Manager. Am I exempt from the benchmarking law? What is the use of an EUI?**

No, the law applies to all building types “for which ENERGY STAR tools are available.” Even if no score can be calculated, Portfolio Manager can still generate many useful statistics, including weather-normalized source Energy Use Intensity (EUI) and extrapolated greenhouse gas emissions. Portfolio Manager allows you to benchmark your building against its own past performance regardless of whether a score is generated. Therefore, the “tool” is still available. If the building’s space usage does not match definitions in Portfolio Manager, you should not try to “force” the building into one of the building types in order to receive an ENERGY STAR rating.

### **24. What is the use of an EUI?**

Portfolio Manager allows you to benchmark your building against its own past performance regardless of whether a score is generated. You can also compare your building’s EUI against national average EUIs for that type of building. For those buildings that are not eligible to receive a rating, EPA has created a list of reference EUI targets. These are based on average energy use calculated across different types of buildings. These energy performance targets are not normalized for climate nor adjusted for activities which may affect energy use. All targets are expressed in energy use intensity (EUI) and are derived from the Commercial Buildings Energy

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Consumption Survey (CBECS). Moreover, once DDOE publishes the benchmarking data, you will be able to compare your own EUIs against those of similar buildings in the District. The EPA is always working to develop rating criteria for additional segments of the commercial building market, including multifamily housing.

### **25. My company leases and manages an entire building, and the owner is an absentee landlord. Can we benchmark the building ourselves?**

If the building owner delegates the benchmarking responsibility to the single tenant, and that tenant consents then the tenant can assume benchmarking responsibility under DDOE. You must, of course, provide DDOE with proof this delegation has occurred. A copy of a letter countersigned by both parties will suffice. Further guidance, along with a form letter you can use as a model, can be found in the *Single-Tenant Delegation Model Letter* guidance document. This only needs to be done once; thereafter, as long as the owner and tenant remain the same. DDOE will communicate directly the tenant and they will be responsible for fines if they do not report by the deadline.

### **26. My building has occupants involved in work affecting national security. Is my building exempt from the benchmarking disclosure requirements?**

It is not automatically exempt, but an exemption can be requested. This exemption can be handled under the Green Building Act as laid out in Section 3511 of DCMR, as a public interest exemption pursuant to Section 3511.2(b). The exemption request is subject to the approval or rejection of the Green Building Advisory Council.

### **27. When do I benchmark if I have not owned my building for a full year, or my building is newly built?**

Building owners should begin benchmarking the first full calendar year after:

- the building receives its Temporary Certificate of Occupancy or Certificate of Occupancy (whichever comes first)
- the building changes ownership

### **28. My building is smaller than 50,000 square feet. Can it be benchmarked and reported?**

- Yes! All buildings over 5,000 gross square feet can be benchmarked using Portfolio Manager. If you wish your building's data to be included in the public database, you can voluntarily submit it to the District using the same process as is used for mandatory reporting. Building owners with buildings that are very strong energy performers may wish to showcase their results in the District's benchmarking database in order to attract tenants or other business.

## **COLLECTING AND ENTERING DATA**

### **29. I have already benchmarked my building(s) in Portfolio Manager. Can I just submit the building report *as is* to the District, or are there additional fields I have to include?**

For 2010 and 2011 data, yes, you can. Benchmarking under District guidelines is based on EPA's standard Portfolio Manager requirements, and all definitions and processes are based on Portfolio Manager guidance. For calendar years 2010 and 2011 only, the District will not be requiring any additional information beyond what is required by EPA to successfully benchmark a building in Portfolio Manager. Only space use fields required by Portfolio Manager need to be in your 2010 or 2011 report, and water data is also optional for 2010 and 2011 reporting. Spaces that can be excluded from an ENERGY STAR certification application, such as ground-floor retail, can also be excluded from your 2010 and 2011 reports to DDOE. Consult the *2010-2011 District Data Collection Worksheet* for more details.

However, beginning with calendar year 2012 data, and for all years thereafter, some data that is "optional" in Portfolio Manager benchmarking is required under District regulations. Consult the *2012 District Data Collection Worksheet* for a full set of District-specific data requirements. Briefly, these fields include:

- Water utility data for your building
- Certain space use attribute information
- Inclusion of all spaces in the building, including tenants who can be exempted under the standard ENERGY STAR process, such as ground-floor retail stores and restaurants in an office building.

### **30. The Benchmarking law states that I must provide energy use data for the calendar year – January 1 – December 31 – but my utility bills do not correspond exactly with the days of each month. How should I enter this information?**

Since most bills do not begin on the first of the month and go to the last day of the month, you will need to include additional months so that your data is inclusive of January 1 to December 31. You may need as many as 14 months of data for each calendar year. If you are missing part of the year, Portfolio Manager will report N/A and you will not be able to submit to DDOE. Some utilities include usage for the last 12 months on each bill, so that may help you more easily identify your usage. The most important thing is to be consistent in how you enter utility bills. Portfolio Manager does apply a simple time-weighting formula to data that does not fit into the calendar year.

## DDOE Energy Benchmarking: Frequently Asked Questions (F.A.Q.)

### 31. How do I get utility data for my whole building from the utility company?

Pepco is supporting the Benchmarking Regulations in the District of Columbia by providing aggregate energy use data to authorized Requestors. To assist building owners or other authorized parties obtain historical consumption data of a building that has multiple, separately metered tenant accounts, and where the building owner is unable to obtain consumption data from all individually metered tenants, Pepco has developed a [Building Electricity Consumption Data Request Form](#) that can be submitted to the Company for processing. In order for Pepco to process the request, a building must have five (5) or more individually metered electric accounts; however, Pepco reserves the right to deny requests for consumption data if it determines that individual customer privacy would not be protected. Requests for aggregated consumption data on buildings with four (4) or less individually metered accounts will require the consent of each customer.

To process the request, the Requestor must provide, to Pepco, complete information identifying each electric meter servicing the building. A meter number for each electric service point is acceptable if individual customer account numbers are not available. Pepco will provide consumption data, in the aggregate, by month and year, for service points and/or account numbers that are provided and will work to respond to these requests within ten (10) business days. However, response time may vary depending on the volume of data requests and available resources.

As of February 2013, it is not yet possible to get whole building data from Washington Gas or DC Water.

### 32. Are tenants required to provide energy and water use information to a building owner? What about tenants who manage their own energy use?

Non-residential tenants are legally obligated to provide the requested information to the owner within 30 days of the building owner or their agent requesting the data. Residential tenants are not required to provide any energy, water, or space use information to their landlord. Failure of a tenant to provide requested information, or of an owner to report benchmark results, may subject the tenant or owner, respectively, to a fine from DDOE of not more than \$100 per day of noncompliance.

DDOE has provided template *Non-Residential Tenant Information Forms* for requesting information from your tenants. You are not required to use this form, but you may wish to do so if you need to provide your tenants with proof that DDOE is in fact requiring them to provide you with data. For residential tenants, please see below.



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### 33. Do I have to collect data from residential tenants?

No. You do NOT have to collect any space use or energy information from residential tenants. For a master-metered building, you would still benchmark the whole building since you have access to total energy use. For a residential building with separately-metered tenants, you would only benchmark common spaces and non-residential tenants. Beginning in 2014, you will have to include aggregate whole-building electricity information, which you [can get from Pepco](#).

### 34. Can my tenant(s) sign a waiver to give me access to their utility data?

Yes, DDOE has prepared a waiver form, available in the set of benchmarking guidance documents at <http://ddoe.dc.gov>, both independently and as Section C of the *Non-Residential Tenant Information Form*. Your tenants can complete, sign and return this form to you, which you can then provide to Pepco, Washington Gas, and/or DC Water.

### 35. Do I have to request data from federal tenants?

Yes, you must request data from all non-residential tenants, including federal tenants. However, the District does not have the legal authority to *require* the federal government to provide this data, so the General Services Administration (GSA) may deny or ignore your request. If you are unable to get data from a federal tenant, you may submit a partial report without the federal tenant(s). You must list the non-reporting federal tenant in the notes field so the report can be properly identified as a partial building and so DDOE can work with GSA to increase the number of federal tenants that comply with data requests.

### 36. How do I account for vacant space in my building?

*If vacant space averages at least 10% of the building floor area over the past 12 months, vacant space must be input in Portfolio Manager as a separate space. Report zeros for characteristics like operating hours and workers, and report heating and cooling as it occurs in the vacant space. For further assistance, please consult the ENERGY STAR FAQ resources or contact the DC SEU Benchmarking Help Center.*

### 37. What do I do if I had a tenant who no longer leases space in the building? Do I have to track them down to try to get the information?

If you had tenants whose lease ended, and who vacated the building, prior to the finalization of the benchmarking regulations on January 18, 2013, you need not attempt to collect any data from them. Building owners *are* required to request data from any tenants whom have an active lease as of January 18, 2013, and those tenants are required to provide access to the data.

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If you *have* energy consumption data that includes that tenant (e.g. because they pay the utility bills for that space) for *all or some* energy utilities: Portfolio Manager Default Values should be used for all applicable space use attributes for this space. To use default values, check the “use default values” box next to the applicable space use attribute field. EPA also provides a list of all default values for your reference.

If you *do not have any* energy consumption data for that tenant (e.g. because the tenant was separately metered and paid the energy bills): The building should be benchmarked as a partial building. The space that the tenant vacated should be excluded from the building’s gross floor area, and no energy or space use attributes should be entered for it.

Note that the operative factor here is *energy* consumption data; whether the building owner has water consumption data that includes a tenant who has vacated the building is not relevant to how the space use attributes for the tenant’s space should be entered, because water consumption does not affect a building’s Energy Use Intensity (EUI) or 1-100 ENERGY STAR<sup>®</sup> score.

### **38. What should I do if one of my tenants is leaving the building mid-year?**

The building owner should ask the tenant to complete a ***Non-Residential Tenant Information Form*** for the period that the tenant occupied the building. The tenant is expected to provide the form to the building owner before leaving the building, or as soon as practical after the tenant has vacated the building. It is easier for all concerned if tenants who will be leaving complete the Utility Authorization form in Section C, so the owner does not have to track down the tenant after they have moved out to get the last month(s) of utility data. DDOE recommends that provision and completion of the Non-Residential Tenant Information Form become part of the standard exit process for any vacating non-residential tenant.

### **39. I do not have all of the tenant information required for benchmarking. What should I do?**

Building owners should make a reasonable effort to obtain the required tenant information, including timely sending a form requesting data to each non-residential tenant, such as DDOE’s Non-Residential Tenant Information Form. You may be asked to provide proof of this effort during an audit. If you are unable to obtain complete building information, you may submit a partial report with all the data you have—including available whole-building information, common area information, and available non-residential tenant information. You must report any non-compliant tenants and their contact information in the Notes field in Portfolio Manager.

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### **40. Can I use estimated data in Portfolio Manager?**

The only instance in which estimated data should be used is when a utility company has used billing periods substantially longer than a month, or a utility data has itself provided estimated bills. Where the billing period is longer than a month, the energy use for the period should be pro-rated into 30-day periods. This pro-rating can be done evenly, but it is better to do it in the same proportion as the previous year's data. If a utility company has provided estimated bills, those estimated values should be used. In both cases, the entry should be checked as a "temporary value." If new, non-estimated data becomes available, then the building owner should come back and update the report within 30 days.

### **41. Am I required to enter my building's energy use data into my Portfolio Manager account on a monthly basis?**

No. To comply with the Benchmarking law, energy use data may be entered all at once at the end of the year or periodically throughout the year.

### **42. Over the course of the calendar year, some aspect of the space use changed—more workers were hired, the tenant operated for longer hours, the tenant changed, etc. Do I need to record this?**

EPA guidance indicates that tenants need only fill out the average numerical value over the course of a year for a space use attribute. However, if a major change (greater than 10%, or, for weekly operating hours greater than 10 hours per week) to a space use attribute occurs, you may optionally record this, as it may affect your score.

### **43. Do I need to enter each tenant as a separate space in Portfolio Manager?**

If your property has multiple tenants with the same space type, these spaces should be entered separately only when the number of weekly operating hours among tenants differs by more than 10 hours. For example, in a 100,000 square foot (SF) office building where 75,000 SF operates 60 hours a week and 25,000 SF operates 80 hours a week these would be listed as two separate spaces – a 75,000 SF space and a 25,000 SF space. As this is most common in office buildings, multiple office space fields are provided below to capture data for multiple tenants if necessary.

### **44. I entered my building's information into the Portfolio Manager Tool and a short while later could not view the information that I entered. What happened?**

If you entered your building's information correctly into your Portfolio Manager account, it typically takes 24 hours before you can view the information in your account. If after 24 hours you still cannot view the information you entered, either you entered the information incorrectly or there is a problem with the Portfolio Manager Tool. First, try re-entering the information into

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your account again. If after re-entering the information the problem persists, contact the DC SEU Benchmarking Help Center at 202-525-7036 or [benchmarking@dcseu.com](mailto:benchmarking@dcseu.com).

### **45. I have a mixed-use building. Can I benchmark it using Portfolio Manager?**

Yes. Portfolio Manager provides guidelines for incorporating various use types within a multi-use building. You will need to create distinct spaces for each distinct building use when you benchmark the building.

### **46. How do I determine the percentage of my building that is heated and/or cooled?**

You should determine what percentage of the floor space is supplied with hot and cool air through HVAC systems. Most office buildings are 100% heated and cooled, although some may have unfinished basements or storage areas that are not conditioned.

### **47. Should my server closets, computer training areas, telecom closets, or print/copy rooms be listed as "Data Center" space?**

No, these are not defined as a "Data Center". The Data Center space type is intended for sophisticated computing and server functions which typically include high density computing equipment, dedicated cooling systems, uninterruptible power supplies (UPS), and raised floors.

Server rooms that do not meet the definition of a "data center" but have separate cooling systems and operating hours that differ from the rest of the building should be entered as a separate space in Portfolio Manager using the Office space type. In this space, enter the weekly operating hours (typically 168 hours), zero workers, and a number of PCs that approximates the number of servers in the space.

### **48. Can my utility company automatically benchmark my building for me?**

Benchmarking requires knowing more than just the energy use of the building. It requires knowledge of how large a building is and how it is used—information that only building owners and tenants have access to. In some cities with mandatory energy benchmarking requirements, utility companies have implemented services that upload aggregate, whole-building energy consumption data to ENERGY STAR Portfolio Manager upon request of the building owner. However, only the building owner can confirm that all meters have been included, enter the required space use information, and authorize transmission of the benchmarking data to the District. Automatic upload of utility data does save building owners time, though, and DDOE is working with Pepco, Washington Gas, and DC Water to bring such a service to the District.

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### **49. Are there other options for benchmarking my portfolio that do not require manual data entry into Portfolio Manager?**

Several energy information and bill handling providers have integrated the EPA's energy performance rating system into their products and services. A complete list can be found on EPA's website [here](#). The DC Sustainable Energy Utility has also compiled a list of benchmarking service providers operating in DC, at <http://dcseu.com/docs/DC-SEU-Service-Provider.pdf>.

### **50. Can building management systems be linked to Portfolio Manager to automatically enter data?**

It is possible to import building data from other tracking systems into Portfolio Manager using a downloadable Excel template. This template minimizes the need for manual data entry of building information by providing a simple way to move data from commercial utility tracking software or in-house tracking tools to a common spreadsheet format that can then be uploaded into Portfolio Manager.

Portfolio Manager also allows you to update multiple meter entries at a time through *Multi Facility Meter Update*, available under *My Portfolio* in Portfolio Manager. This functionality enables you to download an Excel template which will list each facility and meter with the specified number of meter entries you select. You can then transfer data from your in-house tracking tool to the spreadsheet and upload the spreadsheet into Portfolio Manager. This tool is available for Portfolios of 10 or more buildings.

Finally, a number of service providers offer automated benchmarking. For more information on this resource, visit the [Service Providers Automated Benchmarking webpage](#).

## REPORTING AND NEXT STEPS

### 51. What data will DDOE publish online?

DDOE plans to make the following fields for each reporting building available online:

- Building Name
- Building Address
- Year Built
- Gross Building Area (sq ft)
- Space Type(s) in the building
- ENERGY STAR score, when applicable (1-100)
- Weather-Normalized Site Energy Use Intensity (kBtu/sq ft)
- Weather-Normalized Source Energy Use Intensity (kBtu/sq ft)
- Electricity Use (kWh)
- Natural Gas Use (therms)
- Other Energy Use, e.g. Fuel Oil, Steam, Propane, etc. (units vary)
- Water Use (kGal)
- Greenhouse Gas Emissions (tons CO<sub>2</sub>e)
- Any optional narrative information in the notes field that an owner has indicated they wish to be disclosed (see question below).

DDOE will collect additional space use information for analysis and planning, but will not make these attributes public. DDOE is not collecting *any* financial data, baseline data, or target data.

### 52. How do I submit my data to the D.C. Government?

Most buildings will use the following process:

- Make sure all required data for your building has been entered into Portfolio Manager following the *District Benchmark Data Collection Worksheet* for the applicable year(s), including the *Unique Building Identifier*, available on [www.ddoe.dc.gov](http://www.ddoe.dc.gov).
- Wait at least 24 hours since your last change to the data.
- Access the *District Reporting Template* for the applicable year(s) at [www.ddoe.dc.gov](http://www.ddoe.dc.gov) and click the link to automatically download it into your Portfolio manager account. After logging into your Portfolio Manager account, select “Access My Portfolio” on the top left of the screen.
- Under “Report and Analysis” on the right side of the screen, select “Generate Reports and Graphs.” Click the drop-down menu titled “Select a Report Template” and choose “District Benchmark Reporting Template” for the appropriate year(s).

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- On the left side of the screen, select the building(s) that you are submitting. Once done, click the “Release Data” button in the upper right corner. EPA will then send a confirmation to the account contact.

For reporting done prior to July 2013, there will be a special reporting process for buildings that are grouped as a campus using the campus feature in Portfolio Manager. On the main Portfolio Manager screen, click the link to generate a campus report and follow the instructions. Portfolio Manager will provide you with a spreadsheet with all the information on the campus. You must e-mail this spreadsheet to DDOE by emailing it to [info.benchmark@dc.gov](mailto:info.benchmark@dc.gov). Because the campus functionality requires this special, manual submission process in order to report to the District, DDOE recommends that, when in doubt, you group multiple buildings with shared meters as a single property, rather than a campus. When the new version of Portfolio Manager is released in summer 2013, campuses will be able to use the integrated reporting tool as above.

### **53. If I submit my Benchmarking Report and then realize I made a mistake, or find out that there was an error in the utility bills, can I correct my report and resubmit it, even after the deadline?**

Yes; indeed, you must. If an owner receives updated data, they have 30 days to submit a revised report to DDOE. The most likely circumstance where this subsection applies is when a tenant did not provide the building owner with the required energy and space use data, but then does provide the building owner with this data later. A building owner might also receive corrected data from a utility company in the event the utility company discovered an error in its meter readings, or a building owner might need to correct an inaccurate building square footage figure or fix human error.

### **54. Am I required to submit data every year?**

Yes, you must submit a benchmarking report to DDOE every year by April 1, for data from the previous calendar year.

### **55. I am concerned that my score is poor and does not accurately reflect the full context of my facility? How do I communicate this context to those viewing the publicly disclosed data?**

If you have additional information about your building that you would like to submit to help clarify a poor score or Energy Use Intensity (EUI), you may enter this in the Notes field in Portfolio Manager. Such information may include a description of past or future plans for a building (such as an anticipated renovation project), or legal restrictions such as rent control that may limit your ability to make upgrades. You must make clear that you want some of the text made public, as DDOE will by default not make any notes field data public. *The notes field currently allows a maximum of 1000 characters. To conserve space DDOE recommends that you*



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*put the text you want made public first, and use the mark “##” to separate it from the private notes.*

### **56. Is there a penalty for noncompliance?**

Yes. Building owners who do not report benchmark results to DDOE—and non-residential tenants who do not provide requested information to the owner—may be fined *up to \$100 per day* for noncompliance, after the expiration of a 30-day warning period.

### **57. How long should I keep my benchmarking records?**

Building owners should keep benchmark results and supporting records for at least three years. Benchmark results and supporting records should be available for inspection and audit by DDOE during normal business hours, following reasonable notice. Examples of supporting records include, but are not limited to:

- U.S. EPA and DDOE confirmation emails with a proof-of-submission date
- A copy of the building owner’s energy, water, and space use attribute information entered into Portfolio Manager
- Copies of applicable tenant information forms and letters

### **58. Once I know how my buildings perform, how do I go about improving the poor ones?**

Both the District and EPA provide many resources to help you in this effort. First, use the proven [Guidelines for Energy Management](#) offered by ENERGY STAR® to determine where to start and how to maximize the return on your upgrade investments. Second, refer to the EPA’s [Building Upgrade Manual](#) to learn more about specific upgrade strategies and technologies. Additional information on energy management, efficient technologies, and financial evaluation can be found on the [Tools & Resources](#) page on the ENERGY STAR Website.

The DC Sustainable Energy Utility can assist you in saving energy and money, and can work with you to design a customized strategy for maximum energy efficiency improvement. Contact DC SEU at 202-479-2222 or [www.dcseu.com](http://www.dcseu.com).

As you implement new management strategies and technical upgrades, you can use Portfolio Manager to track changes in your buildings’ energy performance and verify improvement.

### **59. I still have questions. How do I get more information?**

- Visit DDOE benchmarking webpage at [www.ddoe.dc.gov/energybenchmark](http://www.ddoe.dc.gov/energybenchmark)

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- Contact the DC SEU Benchmarking Help Center at 202-525-7036 or [benchmarking@dcseu.com](mailto:benchmarking@dcseu.com).
- Contact DDOE at (202) 671-3042 or [info.benchmark@dc.gov](mailto:info.benchmark@dc.gov).
- Attend an in person training event; consult [www.dcseu.com](http://www.dcseu.com) for the events schedule.
- Visit the EPA’s ENERGY STAR® webpage: [www.energystar.gov/benchmark](http://www.energystar.gov/benchmark).
  - To view ENERGY STAR® FAQs, click “Portfolio Manager FAQs” from the “Selected Resources” menu on the right side of the page.
  - To view EPA ENERGY STAR® training information, click “Training” from the “Quick Finder” menu on the right side of the page.