

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment



BEPS Task Force Meeting Notes

March 31, 2020, 2:30-4:30 PM

1200 First St NE, 5th Floor, Washington, DC 20002

Task Force Member Attendees: Katie Bergfeld, Asa Foss, Reshma Holla, Anica Landreneau, Patti Boyd, Jessica Jones, Adrian Gross, Matt Praske, Max Greninger, Joe Reilly, Dave Good, Todd Nedwick, Cliff Majersik, Jay Wilson, Marshall Duer-Balkind, Jen Croft

Other Attendees: Katherine Johnson, Sharon Jaye, Michael Feldman-Wienceck, Andrew Held, Adefunke Sonaike, Dave Epley, Molly Hofsommer, Sean Fish, Christian Clifford, Gabrielle Sosa, Frank Leblanc, Giuls Kunkel, Alex Harry, Andy Ludwig, Janine Helwig, Sally Kram, Kehan DeSousa, Ed Fisher

1. Administrative Items

- a. Started recording of call
- b. Roll call of Task Force Members
- c. Quorum acknowledged
- d. Public attendees entered names in chat box to register attendance

2. Vacancy/Occupancy Sub-committee report-out

- a. Looking at how to treat unoccupied properties at the beginning of the cycle and both in setting the standard and meeting the energy reduction requirements
- b. Occupancy analysis reviewed – no statistical significance when setting standards
- c. Recommendations:
 - i. Set the occupancy threshold as the same as EPA's recommendations
 1. Office: 55%
 2. Hotel: 60%
 3. Multi-Family: 80%
 4. 50% for other building types
 - ii. Building owner would have to apply for an exemption and would be reviewed on case-by-case basis
- d. How to address the current occupancy issue due to COVID?
 - i. Waiting on some guidance from EPA on how to address 2020 data. Depends on how long the crisis goes on. Moving forward as planned.
- e. Did you discuss what proof the building owner would need to provide to get occupancy exemption?
 - i. Concerns about portfolio manager occupancy data – usually set up when building is first entered into PM, and then not prompted to update when submitting use data to DOEE. Would like to provide for latitude for the building

owner to provide different types of documentation. DOEE will need to provide better guidance on keeping this number updated. Suggestion to apply by a certain date after compliance cycle starts.

- f. Are you stating that buildings that are below the occupancy threshold for 2019/2020 are going to be exempt from BEPS for this cycle?
 - i. Can we look into using 2018 and 2020 vs. 2019 and 2020?
 - ii. Concerns about providing blanket exemptions (Would still be eligible for an exemption)
- g. If someone fell below occupancy in 2022/2023, what is the thinking of letting them get out of meeting the requirements?
 - i. It's in the law
 - ii. If you fall below occupancy, you might not have the resources to do the retrofits
 - iii. Need to address the issue of buildings falling to low occupancy and then using that to say that they met the requirements

Action: Vacancy/Occupancy recommendations will be voted on at next meeting

Action: Vacancy/Occupancy sub-committee closed. Could re-open if needed.

3. Public Buildings Sub-committee report-out

- a. Equivalent Metric recommendation and discussion
 - i. Equivalent metric is a fairness issue in how are buildings being ranked against the standard, not measuring performance during compliance.
 - ii. Recommendation from the committee: we use Source EUI as the equivalent metric.
 - iii. Discussion:
 - 1. ENERGY STAR Score – credit given to onsite renewables (Higher score with renewables because no loss in distribution). Source EUI also accounts for onsite renewables, so it's more of a fair comparison
 - 2. Does it matter if it's community solar or if it's onsite? CREFs, PPA, community solar do not count; it needs to be produced and consumed onsite. Is there an exception where MF building that are all separately metered, and if anyone in the building is signed up for the CREF on that building, shouldn't that count towards the efficiency/performance of the building? Suggestion made to add community solar to the bike rack

Action: Equivalent metric as SOURCE EUI will be voted upon at beginning of next meeting

- b. Property Groups 100% owned by one building owner
 - i. Addressing a fairness issue in the way the law is written in that 50% of a property type group will always fall below the median no matter what, so what

happens if one building owner owns all the buildings of one property type group?

- ii. Recommending a portfolio-type approach to give the building owner flexibility in achieving energy savings. Key difference between this and portfolio-wide approach is that this is only for owners that own all the buildings in that property type
- iii. Process
 1. Step 1: Half of the buildings are below the median, Half are above
 2. Step 2: Calculate the savings of the 20% performance path required by the buildings that do not meet the standard.
 3. Step 3: Savings are aggregated as a portfolio goal for an alternative path. Let the building owner decide which projects they can do over that period
- iv. Discussion:
 1. As size thresholds decreases over time, more owners will likely be covered for property types such as other lodging and repair facilities, so this issue will probably go away entirely.
 2. Is this give flexibility to District Government that others do not have? Not just for District buildings, but any single owner of a property type. Comment: Actually District buildings in this case are going to be held to higher standard in some ways because of the median design – half their buildings will always be below. Not the case for private owners.
 3. Comment: Do not want to give credit for closing a fire station to offset other buildings. Reply: Jen: But don't want to discount the possibility of shrinking public building square footage through more efficient use of space and getting credit for that.
 4. Is there an opportunity to introduce a NZE or NZE Ready Alternative Compliance Path?

Action: Revisit this topic for voting after the tradable allowances discussion.

- c. Smaller property type groups < 10 buildings
 - i. Recommendation – For property type groups that have less than 10 buildings, each building will be compared to the national median from CBECs
 - ii. Discussion:
 1. Not much discussion. Most everyone liked this idea.
 2. Suggestion to use something else for laboratories since they are usually benchmarked using Lab21 and not ENERGY STAR
- d. Other items brought to Public Building sub-committee do not need discussion within the sub-committee setting. Department of General Services felt they were better

served as part of the strategic energy management planning process under the purview of DGS separately.

Action: Smaller property type groups recommendation will be voted on at next meeting
Action: Public Buildings sub-committee closed. Could re-open if needed.

4. Setting standard above local median

- a. Presentation of other urban cities' scores in DC's low performing property type groups
- b. Discussion
 - i. Two building types with best chance is warehouse and senior care community because we are so far below other cities. Not true for worship facilities and this is a little trickier for them politically
 - ii. Buildings are being singled out; not being treated like everyone else? Might cause issues for public comment
 - iii. For this program, should we try to keep things as simple as possible
 - iv. Equity standpoint – lower performing are also the most cash-strapped; can we just incentivize them better to bring them up?
 - v. With the current crisis, maybe setting the standard about the local median is the not the right decision now. It's a different discussion than it was 2 months ago when this was first brought up.

Action: Setting standard above local median will be voted on at next meeting

~~5. Standard Target Pathway (median target)~~

- a. Topic skipped to allow time for Higher education presentation

6. Higher Education/Hospital BEPS carve-out introduction

- a. Dave Good (Consortium TF representative, Gallaudet University) and Sally Kram (Consortium) present
- b. COVID-19 impacts: C&U operations are going to be significantly impacted
- c. Energy Management perspective
 - i. Fairly unique challenges
 - ii. Wide variation in the Source EUI across campuses
 - iii. Universities benchmark 42 standalone properties
- d. Does Source EUI apply to campuses properly?
 - i. Problematic – the variety in building types makes Source EUI an issue
- e. Conclusion – median source EUI is not a viable way to determine standard
- f. Discussion
 - i. Did they look at the impact of what if every campus had to decrease by 20% - Started to look at it; would be easier for some universities than others
 - ii. Off-campus buildings are separately meters; on-campus buildings are usually on a district system

- iii. Marshall: they are seeing something similar in other campuses across the country
 - 1. Thermal energy sub-metering is unreliable
 - 2. Helpful for the Task Force to talk about this further through a subcommittee, to address campuses for college/university, hospitals, and other buildings on a campus
- iv. DOEE has more to present at the next meeting. This is part one. DOEE and Higher education institutions have been meeting for 9 months.

7. Next Meeting (April 14)

- a. Voting
 - i. Vacancy/occupancy recommendations
 - ii. Equivalent metric – using Source EUI
 - iii. Property type groups less than 10 buildings
 - iv. Setting the standard above the local median
- b. Topics
 - i. Tradable allowances
 - ii. Standard Target Pathway
 - iii. Higher Ed/Hospital carve-out (part 2)
 - iv. Extended ACP for deep (above and beyond) retrofits

8. Announcements

- a. Introduced Michael Feldman-Wienceck – new BEPS program addition for affordable housing
- b. DOEE received pre-clearance to start drafting rules and share outline with Task Force
- c. Benchmarking deadline is April 1!