

DEPARTMENT OF ENERGY & ENVIRONMENT

PUBLIC COMMENTS

Establishment of the 2021 Building Energy Performance Standards

The following is the full text of all public comments provided in response to a Notice of Emergency and Proposed Rulemaking published in the DC Register on January 1, 2021. Summaries of all comments, along with responses from DOEE, are provided in the preamble to the final rulemaking.

Table of Contents

Comments from Max Bremner of Baumann Consulting.....page 2

From: [Max Bremner](#)
To: [info.BEPS_\(DOEE\)](#)
Subject: Public Comments: Establishment of the 2021 BEPS
Date: Thursday, January 7, 2021 9:34:43 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

To whom it may concern,

I see a potential loophole in the use of Energy Star Score or Source EUI as benchmarking criteria.

Due to the significantly higher conversion factor for electricity from Site EUI to Source EUI, fully electric buildings can easily lower their Source EUI (and increase Energy Star Score) by switching to natural gas for heating purposes before the next BEPS cycle. That would promote on-site fossil fuel use and possibly discourage new constructions from going fully electric.

Best,

MAX BREMNER, B.Eng., LEED AP ID+C
Energy & Commissioning Engineer



Certified Small Business Enterprise - SBE
1424 K Street NW | Suite 500 | Washington, D.C. 20005
main +1 202 608 1334 | direct +1 202 893 7998 | cell +1 559 563 3044
email m.bremner@baumann-us.com
www.baumann-us.com



Before you print – think about the environment