

# Guidance Document

## CBPS 006

**Published Date:** 9/13/2022

**Subject:** Technical Guidance for K12 School Campuses

**Intended Audience:** K12 Schools Authorized Representative

## Purpose

This guidance serves to communicate information specific to K12 schools. A K12 school refers to buildings or campuses used as a school for kindergarten through 12th grade students. Commerce is providing an allowance for K12 school campuses subject to Tier 1 requirements of the Clean Buildings Performance Standard (CBPS.) This allowance will promote more compliance through the energy use intensity target (EUI<sub>t</sub>) performance metric of the CBPS and result in more cost effective energy savings.

## Reference

[Clean Buildings Performance Standard – integrated document](#)

## Background

Clean Buildings Performance Standard compliance is mandatory for Tier 1 buildings located in Washington state. A Tier 1 building (formerly known as covered commercial building) is a building where the sum of nonresidential, hotel, motel and dormitory floor areas exceeds 50,000 gross square feet, excluding the parking garage area.

A building complex is defined within the CBPS as a group of buildings interconnected by conditioned spaces on contiguous property. Contiguous property is adjoining property under sole ownership.

The intent of the CBPS is to require compliance on an individual building or building complex level and not on a campus level; thus, rules were developed to reflect such intent. Under further consideration, Commerce recognizes many K12 school campuses are commonly served by a single meter to a number of structures with the same building type and usage.

### Compliance Dates

June 1, 2026  
More than 220,000 sq. ft.

June 1, 2027  
More 90,000 sq. ft. but less than 220,001 sq. ft.

June 1, 2028  
More 50,000 sq. ft. but less than 90,001 sq. ft.

This places the burden of investing in submetering or compliance through the investment criteria on the majority of K12 schools in the state. Furthermore, K12 school energy use intensity targets (EUI<sub>t</sub>) were developed using average regional and national energy use intensity data from a campus wide level and not at the building level. Therefore, compliance at the building level may not accurately reflect average EUI<sub>t</sub>s developed for the CBPS.

## Guidance

Commerce will provide the following allowance for K12 school campuses subject to Tier 1 requirements of the CBPS in order to allow for more compliance through the EUI<sub>t</sub> performance metric of the CBPS.

K12 schools shall report all Tier 1 covered buildings as singular buildings or building complexes as defined by the CBPS or they shall report as a K12 school campus.

A K12 school with pre-kindergarten must have at least 75% of the students in grades kindergarten through 12. This does not include college or university classroom facilities/laboratories, vocational, technical, trade, adult, or continuing education schools, preschools or day care facilities.

### **Energy Use Intensity Target (EUI<sub>t</sub>) Determination**

Spaces that are not listed within the [Portfolio Manager definition for K12 schools](#) but are part of the K12 school campus can be included in an area weighted EUI<sub>t</sub> calculation for the campus. For example, a space containing a swimming pool can be included in an area weighted EUI<sub>t</sub> of a K12 school campus.

K12 school buildings that include a cafeteria serving multiple complexes may use the cafeteria building activity EUI<sub>t</sub> listed in [CBPS Table 7-2a](#) to develop an area weighted EUI<sub>t</sub> for the building or campus in which it is housed.

### **Energy Use Intensity (EUI) Determination**

The gross floor area measurement used in determining a K12 school campus EUI can include the floor area of all conditioned structures on contiguous property – with the exception of unoccupied portable classrooms used for storage or otherwise no longer in service.

**If you have questions on the guidance for K12 schools, please complete the [Customer Support Form](#).**