

April 13, 2021- Live Q&A Session

Submitted by: Julia Weigel		Topic: Clean Buildings Performance Standard
Question:	How are campuses, like those of school districts, expected to comply? In many cases there is one meter for the whole campus and only one or two 50K+ buildings that would need to comply. Is the expectation that these districts invest in submeters for the individual buildings? Can they rely on an ASHRAE Level 2 audit, O&M plan and EMP plan to prove they are implementing all cost effective measures? Can the campus be reported as a whole group greater than 50K if the meter is at campus level and get the campus Energy Use Intensity (EUI) in line with the target for the schools?	
Answer:	The Clean Buildings Performance Standard applies to individual buildings with over 50,000 square feet of floor area and cannot be aggregated at the campus level. If a covered commercial building is not individually metered it cannot create its own EUI and shall comply with the standard through the investment criteria performance metric. The investment criteria requires a level 2 energy audit and implementation of all energy efficiency measures (EEMs) identified as cost effective in accordance with the investment criteria of Normative Annex X .	
Submitted by: Julia Weigel		Topic: Clean Buildings Performance Standard
Question:	Question regarding Gross Floor Area reported. Will DOC be checking GFA discrepancies between assessor data and ENERGY STAR profiles? How will these discrepancies be evaluated? What reporting is needed to prove a reported GFA is accurate, even if it does not match assessor data? Will there be a need to document the calculation of GFA?	
Answer:	<p>County assessor data should not be considered the definitive data for figuring out the square footage of a building. County assessors collect data at the parcel level and are recording the structures on each parcel for tax purposes. Due to different tax exemptions, many large buildings subject to the Clean Buildings Performance Standard do not have any structural square footage recorded in county assessor data. We are using GIS-created building footprints and associated LIDAR data to estimate the size of Washington's buildings, and aggregating the parcel data as best we can at the building level to provide that to building owners as a reference.</p> <p>All building owners must report their gross floor area in the Clean Buildings Portal. If the owner reported gross floor area pushes the building GFA below 50K gross square feet, or if it changes the compliance date for the building (example, a building GFA goes from 93K to 89K), we will request further documentation, such as blueprints, from the building owner(s) affected. We will also request additional documentation from multi-parcel building owners who indicate that what we pulled into our data system as one building is in fact separate buildings. EUI and EUI_t calculations will be based on the owner reported gross floor area. Owners will use ENERGYSTAR Portfolio Manager to benchmark their buildings EUI, and what they report in Portfolio Manager will be considered the definitive gross floor area for the building. Because the assessor data was not designed for the purpose of creating a buildings database, we do not plan to check GFA discrepancies between assessor data, owner reported GFA and what is benchmarked in Portfolio Manager beyond what was already discussed.</p>	

Submitted by: Leona Haley		Topic: Clean Buildings Performance Standard
Question:	The original 50,000+ SF building built in 1890 qualifies for the historical registry and is exempt from the CBL. There is also an 80,000 SF addition built in 1983 that would be considered part of the same building. Would that cause the entire building, including the original 1890's part to meet the CBL?	
Answer:	Certified historic buildings are not exempt from the requirements of the law. However, no individual energy efficiency measure identified by an energy audit needs to be implemented if it would compromise the historical integrity of a building or part of a building. See Informative Annex Z6.6 for more specifics as well as reporting and documentation requirements.	
Submitted by: Meghan McNulty		Topic: Clean Buildings Performance Standard
Question:	Do buildings that will apply for exemption (e.g. manufacturing facility) need to be benchmarked in ENERGY STAR Portfolio Manager?	
Answer:	No, buildings approved for exemption will not be required to benchmark. Although, the building will still need to apply to be exempt.	
Submitted by: Kellie Boylon		Topic: Clean Buildings Performance Standard
Question:	For distribution warehouses that only have Reznor type heaters for freeze protection of the fire sprinkler lines within the warehouse area, does this area count as "semi-heated" space that can be deducted from the overall gross floor area to qualify for exemption?	
Answer:	Potentially, if the area in question meets the definition of semi-heated space <i>Semi-heated space:</i> An enclosed space within a building, including adjacent connected spaces separated by an uninsulated component (e.g., basements, utility rooms, garages, corridors) which: (a) Is heated but not cooled, and has a maximum installed heating system output capacity of 3.4 Btu/(h-ft ²) but not greater than 8 Btu/(h-ft ²); (b) Is not a walk-in or warehouse cooler or freezer space.	
Submitted by: Court Olson		Topic: Clean Buildings Performance Standard
Question:	Why can't the performance standards deadlines for all buildings covered by CETA be made effective in 2026?	
Answer:	According to RCW 19.27A.210 , the clean buildings law establishes the deadlines for meeting the standard. We are unable to alter the deadlines.	
Submitted by: Chris		Topic: Early Adopter Incentive Program
Question:	As a Public Hospital District and CAH, is there any funding to help with costs to implement changes that this law will create?	

Answer:	<p>We have the Early Adopter Incentive Program. It is for early compliance with the Clean Building Standard. It begins July 1 of this year (2021). There are some qualifications that buildings have to meet.</p> <ul style="list-style-type: none"> ○ The building must be a covered commercial or multifamily building with over 50,000 square feet of floor area. ○ At least one participating "qualified" electric utility, gas company or thermal energy company providing or delivering energy services. <ul style="list-style-type: none"> • This is a state incentive and can be administered in addition to utility conservation incentives. • Utilities that do not pay public utility taxes (PUT) are not "qualified" to participate in the Early Adopter Incentive program. ○ The building must be 15 Energy Use (EUI) Intensity or more above their target. ○ The building must be brought into full compliance with the Clean Buildings Standard, and meet their Energy Use Intensity target (EUI_t).
<p>Submitted by: Julia Weigel Topic: Clean Buildings Performance Standard</p>	
Question:	<p>Follow up to #1: to be clear - if they go down the investment criteria path without submetering, doesn't that require they do a Level 2 ASHRAE audit every 5 years? That can be more expensive than doing submetering once.</p>
Answer:	<p>Yes, that is a good point. The Clean Buildings Performance Standard has a five-year cycle and compliance will have to be revisited. If you do not have independent metering for that building, every five years you will have to do the audit and invest in the cost-effective energy efficiency measures at that time.</p> <p>If you decide to submeter upfront to get the building on a path towards compliance with the EUI_t, you might avoid future audits.</p>
<p>Submitted by: Julia Weigel Topic: Clean Buildings Performance Standard</p>	
Question:	<p>In terms of implementing all cost effective efficiency measures from a Level 2 Audit: how is useful life determined? What standard will be used?</p>
Answer:	<p>All of the details can be found in Normative Annex X of the Clean Building Standard. The certified energy auditor will understand how to define useful life.</p> <p>There is no specific reference in the Clean Buildings Performance Standard in determining useful life when evaluating the cost-effectiveness of energy efficiency measures (EEM). It is the obligation of the qualified energy auditor to reference industry standards in determining the useful life of any EEM. ASHRAE does publish an equipment life expectancy chart likely to be referenced by many professional energy auditors.</p>
<p>Submitted by: Pete Segall Topic: Early Adopter Incentive Program</p>	
Question:	<p>To submit for the Early Adopter Incentive program, is a L2 Audit required or just the Department of Energy Building Energy Asset Score Audit Template?</p>
Answer:	<p>A level 2 audit is identified as having enough rigor to assure measures needed to meet the target. The level 2 audit is needed so that we will not be tying up incentive funds, and it provides enough assurance that the target will be met.</p>

Submitted by: Erik Budsberg		Topic: Early Adopter Incentive Program
Question:	For utilities that serve less than 25,000 customers, is there any incentive/benefit for them to voluntarily enroll in the program? Or is that benefit directly passed along to the building owner?	
Answer:	There is a benefit for utilities to participate in the incentive program. The program provides a credit towards the Public Utility Taxes (PUT) owed. If a utility has the tax credit available they can participate in the program. If a utility does not have the tax credit available they are not required to participate.	
Submitted by: Erik Budsberg		Topic: Clean Buildings Performance Standard
Question:	We are a university with all different building types. I was looking through ASHREA 100 trying to determine our EUI targets. For determining commercial building type, is that for us to decide what best fits our building profile? We have a science building, does that qualify as lab space? Lab space vs College/Universities? How do we know which target type do we use? For setting the EUI targets, are we supposed to use the catch all of college/universities even though those building space aren't being used the same across campus?	
Answer:	All building activity types are defined by Energy Star Portfolio Manager (ESPM). College/university is defined and lists all the different types of spaces including laboratory, classroom, offices, etc. Data used to develop target EUI for college/university was campus-wide and is the aggregate average for building activities listed within the Energy Star definition. The Clean Building Standard is a building level standard. A laboratory is likely to use more energy than the target, however, a classroom is likely to use less energy. If you take each individual building, you are likely to have just as many buildings affected positively by an averaged target as you would have buildings affected negatively. If there are any buildings not defined within the definition for college/universities, find the most appropriate building activity type listed in the table and treat that building separately.	
Submitted by: Erik Budsberg		Topic: Clean Buildings Performance Standard
Question:	I know there is the special rule for campuses with district heating system. Can we use the combine gross square footage of our buildings over 50,000 sq ft and look at the energy provided through our district heating system and then use that to calculate the EUI? Or do we need to look at the individual buildings for that EUI and see if that averages out for all of the campus to be hitting the target?	
Answer:	There is no campus-wide criteria in the Clean Building Performance Standard, so you will have to treat every building individually. If you are unable to develop an EUI for that building, for example, it is served by a campus heating and cooling district system, you will need to complete a level 2 energy audit and comply with the investment criteria performance metric and not the EUIt. There is an exemption when you do an audit on a building and it defines the cost-effective energy efficiency measures (EEMs) – and the audit will determine the net energy savings of those EEMs. You can substitute some of those savings by making improvements to the central district heating system. For example, if the audit says you can save 20 EUI per square foot equivalency by implementing a list of EEMs. If you decide that it is more cost-effective to improve the district heating system, you can apply those savings to any building in which that system serves. The EUI targets are state specific and can be found in Normative Annex Z , Table 7-2a.	
Submitted by: rmgaynor		Topic: Clean Buildings Performance Standard

Question:	Can lab buildings on college campuses have 24/7 operation if their mechanical equipment is required to operate 24/7? (building may be only open to the public less than 24/7)	
Answer:	The laboratory EUI is folded into an aggregate EUI average for campuses. There are no additional normalization factors. When the data was collected to create the target, it was assuming that laboratories have that 24-hour operation on average for the equipment they have. There is no exception for laboratories and disaggregating them from a college campus EUI target. They are listed within the definition of ESPM for college/university.	
Submitted by: Pete Segall	Topic: Clean Buildings Performance Standard	
Question:	I am a bit confused by the college EUIt discussion. Are you saying a college university can use either the generic EUIt category catch all "College/University" or something more specific if applicable, i.e. "Technology/Science - Laboratory"?	
Answer:	The Clean Buildings Performance Standard says to use the target defined by ESPM . In the definition for college/university, or any building activity type listed there, you would use the college/university target. Anything outside of the definition on a campus, you will find the most appropriate building activity type as defined by ESPM . In summary, yes, you would use college/university if that building type is listed.	
Submitted by:	Topic: Clean Buildings Performance Standard	
Question:	If you use an audit, are you guaranteed that you're going to reach your benchmark?	
Answer:	<p>The energy audit is going to be required if you can't meet your EUIt by the compliance date. You will then need to invest in all the cost-effective EEMs identified in the audit using Normative Annex X. If you implement all the EEMs, there is a verification of the savings. You have to meet a minimum of 75% of the savings identified in the audit through the implementation of the EEMs. If you don't meet 75% of the identified savings, you will need to reevaluate the audit and determine if there are any more cost-effective EEMs to achieve the identified savings. Buildings that cannot measure EUI shall verify savings associated with installed EEMs using the methods of the International Performance Measurement & Verification Protocol.</p> <p>There is no guarantee that you will get those savings, but there is a 25% leeway. It is assumed that the majority of audits are going to be accurate enough to result in achieving 75% percent of the predicted savings.</p>	