# Compliance by Meeting the EUIt

**This document can be used to assist building owners in pursuing compliance by meeting the energy use intensity target (EUIt).**

The following outlines the steps towards demonstrating compliance by meeting the EUIt:

**Compliance Dates**

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

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

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

**1)** **Watch** Clean Buildings 101 for an overview of the Clean Buildings Performance Standard.

**2)** **Gain** an understanding of the Clean Buildings Performance Standard.

To understand the full scope of the rules you must read both:

- ASHRAE Standard 100-2018 Energy Efficiency in Existing Buildings.
- WAC 194-50 (WA amendments to Standard 100). Follow the link below to gain access to the.

Click on the link to gain access to the Clean Buildings Performance Standard – Integrated Document.

**3)** **Determine** if the building is exempt. See Annex Z4.1 or the exemption guide sheet.

**4)** **Benchmark** the building. Benchmarking is an important process in defining which performance metric to pursue for compliance with the standard. Measure weather normalized EUI (WNEUI) within the ENERGY STAR Portfolio Manager (ESPM) account. Use a minimum of 12 consecutive months of energy data, measured in a period not to exceed two years prior to the submission of compliance documentation demonstrating the EUIt has been met prior to the compliance date.

_Note: Buildings unable to measure EUI in accordance with Section 5.2 shall pursue compliance in accordance with the investment criteria performance metric and are not required to create an ESPM account._

  a) To learn how to use ESPM and benchmark your building:

  i) You can sign up for the Environmental Protection Agency (EPA) training series on using Energy Star Portfolio Manager for benchmarking;

      ii)  Or watch [training videos](#) created by the Smart Building Center.

   b)  Create an [Energy Star Portfolio Manager account](#).

Tip: Understand your utility providers' role in compliance. Utilities are required to provide energy consumption data to building owners upon request. Large utilities (greater than 25,000 customers) are required to provide this data using Energy Star Portfolio Managers' automated upload protocol. Smaller utilities are to provide the data to building owners in an excel document, meeting Energy Star Portfolio Manager specifications (See [RCW 19.27a.170](#)).

**5)** **Develop** the EUIt for the building in accordance with Section 7 of the Clean Buildings Performance Standard. Visit the Clean Buildings How to Comply page to review the How to Determine Energy Use Intensity Target (EUIt) guide sheet.

*Note: Buildings unable to develop a EUIt shall pursue compliance in accordance with the investment criteria performance metric.*

To meet the EUIt, a weather normalized EUI (WNEUI) must be developed using Energy Star Portfolio Manager (ESPM) and measure equal to or less than the EUIt. More recently building buildings, in addition to the requirements of Section 7.2.1, shall create a second EUIt that is 15% less than the target developed for compliance with Section 7.2.1. This shall be the building's EUIt and shall be noted in the Clean Buildings Portal.

**6)** **Develop and implement** the Energy Management Plan (EMP) and associated Operations and Maintenance program (O&M) for each building as outlined in Sections 5 and 6 of the Clean Buildings Performance Standard.

The EMP and O&M are mandatory requirements for all covered commercial buildings. Implementation of these requirements can begin at any time. The O&M requirements must be implemented 12 months prior to the mandatory compliance date**.**

Tip: Designate an *energy manager* and identify your *qualified person*. A *[qualified person](#)* requires specific expertise and certification. Click here for defined [roles and responsibilities](#).

**7)** **Submit** documentation of compliance. Building owners must submit the following documentation through the Clean Buildings Portal to verify the building weather normalized EUI is less than or equal to the building EUIt**,** the energy management plan is complete**,** and the O&M Program has been implemented for a minimum of 12 months.

- Form A – Shall be used to communicate compliance and reporting progress. It includes documentation of weather normalized EUI and the calculated EUIt for the building. It also requires uploading the building energy management plan and O&M program, in addition to Form D for reporting any energy audit performed on the building. Download Form A [here](#). This is physical form produced by Commerce that will be filled out, signed, and uploaded to the Clean Building Portal with associated supporting documentation.

- Form B – Identifies the building activity and energy use intensity target (EUIt). Log into the Clean Buildings Portal. Fill out the building details and activity type pages in the Clean Buildings Portal to fulfill the requirements of Form B.

- Form C –Documents the weather normalized EUI in addition to other building characteristics and data. The Washington state specific report within ENERGY STAR Portfolio Manager is known as WA State Clean Buildings EUI Calculations, Form C. Click on this link and log into your ENERGY STAR Portfolio Manager account. Complete this specific report in your account to fulfill the requirements of Form C.

- Form D – Summarizes energy audits. Energy Audit Report, Form D is a Washington State specific report within the Audit Template form of the U.S. Department of Energy's Energy Asset Score Tool. Visit the U.S Department of Energy - Building Energy Audit Template website. Select the Audit Template tab. Click on Add Audit Report and select WA Commerce CB Report. Fill out the information in the report to fulfill the requirements of Form D.

*Note: Document compliance through the Clean Buildings Portal as early as July 1st, 2023.*

**Need more time to comply?** Conditional Compliance is a temporary compliance method that can be applied if the EUIt or investment criteria *verification requirements* will not be met by the scheduled compliance date. Applicants can avoid potential penalty when Conditional Compliance is approved and requirements maintained.

**For additional guidance or questions on how to achieve compliance by meeting the EUIt, complete the Customer Support Form.**