

Guidance Document

CBPS 007

Published Date: 9/13/2022

Subject: Owner Provided Energy Meters
(Submeters)

Intended Audience: Building owner, Authorized
Representative, Qualified Person, and General
Public

Purpose

This guidance serves to communicate information to building owners and their authorized representatives of the Clean Building Performance Standard (CBPS) requirements for owner provided energy meters.

Reference

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

Background

The Clean Buildings Performance Standard (CBPS) 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.

Benchmarking is an important step in the process of defining which performance metric to pursue in complying with the CBPS. Benchmarking involves measuring the building's energy use intensity (EUI) using a minimum of 12 consecutive months of net energy consumption. Buildings capable of measuring EUI in accordance with Section 5.2 may pursue compliance by meeting the energy use intensity targets (EUI_t) created in accordance with Section 7 of the CBPS.

There are situations in which owner-provided energy meters, commonly known as submeters, are needed to measure the EUI of a building. Buildings unable to measure net energy consumption in accordance with section 5.2 shall pursue compliance with the CBPS through the investment criteria performance metric.

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.

Definition and benefits

Submetering is a method of monitoring a building's energy consumption below the level necessary for utility billing. It can provide individual insight on all energy types used such as electrical, natural gas, steam and hydronic systems. Submeters can capture data for individual buildings on a campus to individual building systems. It can also provide real time data around the clock, when the building is fully occupied or unoccupied.

Submetering by itself does not reduce energy use, cost or greenhouse gas emissions; however, when strategically placed to monitor energy consumption, it can provide insightful energy efficiency strategies.

Additional benefits of submetering include:

- Building operation improvements
- Verifying the return of investments on energy efficiency projects and investments
- Identifying energy improvements and savings
- Creating energy budgets and reports; and
- Performing measurement and verification for projects.

Guidance

When to submeter

Submetering is not required for the CBPS. However, if the desired performance metric is to meet the EUI and the existing metering configuration does not support energy consumption on an individual building level, submetering can be employed to generate the EUI.

Submetering can also be used on spaces in the building that do not have an EUI, such as data centers. The CBPS has allowances for spaces with building activities that do not have an EUI to deduct energy use and gross floor area from the building's EUI when such spaces are submetered (Exceptions 3 & 4 of Section 7.2.3).

Submetering Guidance

Section 5.2 Building Energy Monitoring requires that energy-use data for each type of energy imported into and exported from the building be collected from utility or energy delivery bills or by monitoring local energy meters. Owner-provided energy meters shall meet the metering accuracy, tolerances and testing requirements of [Title 480 WAC](#).

In lieu of Title 480 WAC, Commerce will also accept owner provide energy meters that meet the CBPS of [WAC 51-11C-40904 Section C409.4- Measurement devices, data acquisition system and energy display \(Section 409.4 of the Washington State Energy Code \(WSEC\)\)](#). Metering requirements shall apply to each whole building energy source and does not need to apply to each end use category. Meters owned by the facility shall be calibrated at least once every five years per the manufacturer's instructions. Maintenance and inspection of owner provided meters shall be inspected and maintained in accordance with manufacturer's instructions and shall be included in the buildings operation and maintenance program.

If you have questions on submetering for the CBPS, please complete the [Customer Support Form](#).