

ENERGY PERFORMANCE REPORTING FOR COMMERCIAL BUILDINGS

IF YOU WISH TO SPEAK TO CITY COUNCIL, PRINT YOUR NAME, ADDRESS, AND EMAIL.

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April 15, 2015

Mayor Charlie Hales
Members of the Portland City Council
1221 SW Fourth Avenue
Portland, Oregon 97204

RE: Commercial Building Energy Performance Reporting Proposal

Dear Mayor Hales and Members of the Portland City Council:

Pacific Power appreciates the opportunity to be part of an invited panel to comment on the Bureau of Planning and Sustainability's (BPS) proposed energy performance reporting policy. With over 8,000 commercial customers in our Portland service area, Pacific Power actively works with Energy Trust of Oregon to encourage high efficiency building practices and support energy awareness and education. We support customers actively participating in managing their energy usage and benchmarking can be a valuable tool in gaining a better understanding of building energy performance.

Pacific Power's experience with the ENERGY STAR® Portfolio Manager tool that will support the proposed policy is unique among the Portland utilities. For several years, Pacific Power has provided commercial customers with a quick and easy process to download up to 24 months of electric energy usage data into a Portfolio Manager compliant spreadsheet via our secure customer account website. If the customer has already established their Portfolio Manager account, they can then manually upload the spreadsheet and then, along with their own other data inputs, perform their own energy performance reporting including calculating their building's ENERGY STAR® score.

Recent community requests, mandatory benchmarking laws, and increased customer interest in energy usage benchmarking have resulted in Pacific Power's need to improve our current data download offering. Some recent examples:

- California AB 1103 – Requires energy benchmarking and disclosure for non-residential buildings to prospective buyers, lenders and/or lessees.
- Washington SB 5854 – Requires energy benchmarking and disclosure for non-residential buildings to prospective buyers, lenders and/or lessees.
- Salt Lake City, UT – The Better Buildings Energy Data Accelerator has local governments and utilities working together to make it easier for building owners to get access to whole-building energy usage for the purposes of benchmarking.
- Georgetown University Energy Prize – Pacific Power/Rocky Mountain Power has five participating communities that require energy use tracking for public buildings. Bend and Corvallis, Oregon, Walla Walla, Washington, and Kearns and Park City, Utah.

Because of the increased interest, requirements and requests for support, the company began a significant upgrade project to our current online energy usage data retrieval system. The new system, expected to be online by the end of 2015, will provide automated electric energy usage data flow into a customer's established ENERGY STAR® Portfolio Manager account. The company is also analyzing the costs and staffing requirements associated with implementing this system upgrade.

Energy performance benchmarking in Portfolio Manager does present some challenges. Pacific Power took an active role in promoting Governor Kitzhaber's "Cool Schools" program and offered ENERGY STAR® Portfolio Manager benchmarking training with a computer lab to over 230 school and public building administrators across the state. Most attendees picked up on how the system worked quickly; however, some folks were more computer savvy than others. Additionally, several were surprised at the amount of building data required to accurately perform energy benchmarking. Typical data requirements for a simple, general office building include gross floor area (SF), weekly operating hours, number of workers on main shift, number of personal computers, percent of floor area that is air conditioned, and percent of floor area that is heated. The more types of businesses in a building, the more complicated the data set required; i.e. data center operations, laundry facilities, cooking equipment, cash registers, pool, etc. If building data was missing or incorrectly entered, the final ENERGY STAR® score was impacted significantly.

ENERGY STAR® Portfolio Manager is an evolving tool and the Environmental Protection Agency, who administers ENERGY STAR®, is always looking at ways to make it easier to use and improve its utility data integration and end-user/customer reporting capabilities. Pacific Power would like to note and recommend the following during implementation:

1. Note: Our utility is in a distinctly different place than Portland General Electric and Northwest Natural Gas. Because of requirements beyond our Oregon service area, Pacific Power has had several years in advance of this proposal to implement and fine-tune our benchmarking process.
2. Note: The level of benchmarking proposed requires dedicated focus by Portland's business owners. Many buildings have multiple building uses and gathering that data will not be easy. Additionally, once that data is gathered, entering it accurately into Portfolio Manager will be critical to develop an accurate ENERGY STAR® score.
3. Recommendation: The city should make exhaustive attempts to provide robust Portfolio Manager training opportunities to affected building owners. Training should not only be offered upon approval of this proposal, but repeatedly as building owners and their designees will change over time as will the Portfolio Manager tool itself.
4. Recommendation: The city should avoid publically disclosing data provided during the first two years of operation. For many building owners, their initial data set to create their Portfolio Manager score will be difficult to obtain. Data may be missing or entered inaccurately, causing a lowered ENERGY STAR® score in the end. The city should look at ways to mitigate errant Portfolio Manager data entries and proactively work with building owners to ensure accurate and appropriate end results.

Again, thank you for inviting us to comment,



Scott Bolton
Vice President, External Affairs
Pacific Power

Parsons, Susan

From: Lesley Painter <lesley@fulcrumpolitical.com>
Sent: Tuesday, April 14, 2015 1:47 PM
To: Council Clerk – Testimony
Subject: Testimony Re: Proposed Energy Performance Rating Policy
Attachments: FINAL USGBC Portland Ordinance Comments 4-15-2015.pdf

Dear Council Clerk Moore-

Please find attached testimony from our partners at US Green Building Council for the 4/15/2015 Portland City Council hearing on the proposed energy performance rating policy. Thank you for submitting their comments for the record.

Sincerely,
Lesley

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Lesley Painter
Executive Assistant
503-893-4035



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FOUNDERS:
David Gottfried
Michael Italiano
S. Richard Fedrizzi

April 15, 2015

To Mayor Hales and Members of the Portland City Council:

This testimony is in support of proposed Ordinance 387, building energy performance reporting.

The U.S. Green Building Council (USGBC) and its local chapter, the Cascadia Green Building Council support mandatory building energy performance reporting of all public and private sector commercial buildings, because an increased awareness catalyzes action to improve building performance.

As the resolution, rightly points out, building energy performance reporting is not only one more tool to address climate change, but is also an economic one. Cities that have adopted building energy performance reporting ordinances are also finding economic benefits, such as increased rental and property values, increased real estate investment, and green job growth. Investors are demanding more disclosure but aren't getting the data they need. At scale, municipal building energy benchmarking and disclosure ordinances could generate the data needed by investors. Given this reality, investors are seeking information regarding the energy efficiency of buildings held by REITs, as well as the buildings being utilized by a variety of other companies.

USGBC supports the broad building industry consensus around the use of the EPA's Energy Star Portfolio Manager tool for building energy performance tracking and reporting. Portfolio Manager is free to use, and utilizes building characteristics and energy and water consumption information to produce an energy consumption per square foot figure that is normalized for space use and climate. This tool is the heart of the LEED for Existing Buildings and LEED Operations & Maintenance rating systems.

USGBC also believes that energy and water performance are not the only green building metrics that can benefit from regular building performance reporting. Understanding building material and resource use, indoor environmental quality, and transportation energy use in a building can illuminate many opportunities for improvement.

We are heartened by the steady adoption rate of building energy performance reporting policies across the country. Municipalities are finding that these ordinances help them achieve the energy and water efficiency goals they have set for themselves. We look forward to working with the City of Portland as it moves forward with this exciting policy.

Sincerely,

Christina Kuo
State and Local Campaign Manager
U.S. Green Building Council
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