

July 21, 2014

Nonresidential Building Energy Use Disclosure Program ) Docket Number 14-EUDP-01  
Title 20, Division 2, Chapter 4, Article 9, Sections 1680-1685)

Re: Technical clarification from the U.S. Environmental Protection Agency's Climate Protection Partnerships Division pursuant to information provided during the Agency's presentation at the July 2, 2014 CEC Staff Workshop on the Nonresidential Building Energy Use Disclosure Program (AB1103) Order Instituting an Informational Proceeding (Order No. 14-0618-9).

To Whom It May Concern:

The U.S. Environmental Protection Agency is pleased to provide additional technical clarifications related to the functionality of Portfolio Manager, EPA's ENERGY STAR measurement and tracking tool. Specifically, we would like to clarify the ability of Portfolio Manager to accept aggregated data for a whole building.

Question: For each fuel consumed in a commercial building, can Portfolio Manager accept aggregated, whole-building data, and do so in a manner that does not reveal any individual tenant account information?

Answer: Yes, Portfolio Manager can accept aggregated, whole-building data, and can do so in a manner that does not reveal any individual tenant account information. For each fuel consumed in a building, a single value can be entered into Portfolio Manager to represent the aggregate, monthly fuel consumption. When these data are supplied by a third party who is not the Portfolio Manager account holder, the provider of this aggregate data can name this single, aggregate entry using any appropriate identifier of their choosing, as long as the name is understood by both the Portfolio Manager account holder and the data provider. In this manner, the data can be provided without any information that could be used to identify individual tenant accounts within the building.

Full documentation of the functionality of Portfolio Manager can be found at:

<http://www.energystar.gov/buildings/facility-owners-and-managers/existing-buildings/use-portfolio-manager>

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