

## DOCKETED

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**ADDENDUM TO INITIAL STATEMENT OF REASONS**

**PROPOSED REGULATIONS**

**WHOLE-BUILDING ENERGY USE DATA ACCESS, BENCHMARKING, AND PUBLIC DISCLOSURE**

**California Code of Regulations  
Title 20, Division 2, Chapter 4, Article 9, Sections 1680 – 1685**

**California Energy Commission**

**DOCKET NUMBER 2015-OIR-05**

**SEPTEMBER 12, 2017**

*This Addendum updates the section from the Initial Statement of Reasons titled “Economic Impact Assessment,” beginning on page 31.*

**ECONOMIC IMPACT ASSESSMENT**

**The creation or elimination of jobs within the state**

Energy Commission staff estimate that 96 jobs will be created as a result of the proposed regulations. Of the estimated 30,800 required disclosures in 2021 (the year after full implementation), staff estimate that 70 percent, or 21,560, will be performed by external energy consultants, with the remainder being performed by internal employees of the building owners. Of those disclosures that will be performed by consultants, staff estimate a consultant completing one disclosure per day on average, and working 242 days per year on average. This results in approximately 89 jobs being created for energy consultants due to the proposed regulations. Employees at each utility will need to verify each request for building energy use data, and send the requested data for requests that pass the verification process. Staff

conservatively (meaning on the high side) estimate an average of one full-time equivalent per utility, for a total of seven employees at investor-owned utilities statewide.

There is no reason to believe that any jobs will be eliminated due to the proposed regulations.

#### **The creation or elimination of businesses within the state**

The proposed regulations do not require any new businesses to be created, and it is possible that all new jobs created by the proposed regulations will be within currently existing businesses. There is no reason to believe any businesses will be eliminated as a result of the proposed regulations.

#### **The expansion of businesses currently doing business in California**

There are companies in California performing benchmarking and reporting services for building owners, either voluntarily or to comply with a local benchmarking program. Local benchmarking programs exist in San Francisco, Berkeley, and Los Angeles, and State agencies in California are required to benchmark and report energy and water use to the California Department of General Services. It is likely that the majority of building owners will choose to hire such a company to perform the actions required by the proposed regulations. Because the proposed regulations will likely cause a significant increase in the population of buildings for which building owners are currently required to benchmark, demand for benchmarking services will increase, and these companies will likely expand.

#### **The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment**

There is not expected to be any direct effect from the proposed regulations on the health and welfare of California residents, worker safety, or the state's environment. However, the public

disclosure of building energy performance will hopefully increase understanding of the value of energy efficiency, which will likely result in voluntary building improvements and building energy efficiency becoming one of the common considerations when considering a building for purchase or lease. In turn, this may lead to a reduction in the pollution caused by energy production (including greenhouse gas emissions) and reduced energy costs paid by utility customers.