

DOCKETED

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Comment Received From: Jaxon Love, Shorenstein Realty Services

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Shorenstein Letter in Support of CBC Comments

Additional submitted attachment is included below.



*Shorenstein Realty Services, LP
235 Montgomery Street, Ste. 1600
San Francisco, CA 94104*

April 26, 2016

California Energy Commission
Andrew McAllister
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

RE: Comments on Initial Staff Proposal to Implement Building Energy Use Data Access and Public Disclosure Provisions of AB 802

Dear Commissioner McAllister,

Shorenstein supports the comments submitted by the California Benchmarking Collaborative on April 14.

Shorenstein benchmarks all its operational buildings, both in California and in 25 markets across our national real estate portfolio. Shorenstein is subject to mandatory benchmarking and public disclosure of energy use and carbon emissions in 11 cities and 2 states and is subject to mandatory water use disclosure in 6 cities. Shorenstein supports well-designed benchmarking legislation as a mechanism for transparency and a catalyst of market-based demand for efficient buildings.

In particular, Shorenstein strongly urges the Commission to prioritize the development of user-friendly automated benchmarking services (ABS) as a critical mechanism for improving data quality, simplifying the benchmarking process for owners, and ensuring high compliance with the state's program.

I would also like to call to your attention that The Urban Land Institute's Sustainable Development Committee, of which I am a member, organized an industry forum on energy benchmarking regulations on March 17 and in partnership with the City of San Francisco, generating important best practice learning for the local real estate community, with valuable lessons for state-level rulemaking. As the responsible party for Shorenstein national energy performance and benchmarking compliance program, I am very glad to provide additional perspective to the Commission. Please don't hesitate to contact me.

Thank you for your time and consideration of the California Benchmarking Collaborative's comments and these additional words of emphasis.

Sincerely,

Jaxon Love
*Sustainability Manager
Shorenstein Realty Services, LP
235 Montgomery Street, Ste. 1500
San Francisco, CA 94104*