

DOCKETED

Docket Number:	15-OIR-05
Project Title:	Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802
TN #:	212734
Document Title:	USGBC Comments: AB 802 implementation
Description:	N/A
Filer:	System
Organization:	USGBC/Brenden McEneaney
Submitter Role:	Public
Submission Date:	8/11/2016 7:20:31 AM
Docketed Date:	8/11/2016

Comment Received From: Brenden McEneaney

Submitted On: 8/11/2016

Docket Number: 15-OIR-05

AB 802 implementation

It has recently come to our attention that public comment has been received in opposition to AB 802 from Randy Walsh, Chief Efficiency Optimizer at San Diego Energy Desk. The USGBC logo was included in Mr. Walsh's letter, and we wish to clarify that his opinion does not represent and is not consistent with that of USGBC on this issue.

USGBC is a member-based organization with more than 12,000 member companies that represent a broad range of opinions and professional expertise – a diversity which we value and believe makes our programs stronger. Inevitably with such a broad coalition, differences arise. All of our member companies are permitted to use the USGBC member logo. Although in this case it does not appear that San Diego Energy Desk is in fact a member company of USGBC, our intent here remains to clarify our support of AB 802. Please see attached comment letter.

Additional submitted attachment is included below.



USGBC
2101 L STREET, NW
SUITE 500
WASHINGTON DC 20037
202 828-7422
USGBC.ORG

CEO & FOUNDING CHAIR

S. Richard Fedrizzi

OFFICERS

CHAIR
Fiona Cousins
Arup

VICE CHAIR
Bob Fox
COOKFOX Architects
Terrapin Bright Green

SECRETARY-TREASURER
Chrissa Pagitsas
Fannie Mae

FOUNDERS

David Gottfried
Michael Italiano
S. Richard Fedrizzi

DATE: August 11, 2016

TO: Chairman Robert B. Weisenmiller
Chair, California Energy Commission
1516 Ninth Street, MS-33
Sacramento, CA 95814

RE: Public comment in support of CEC efforts to develop AB 802 implementation plan, reinforcing comments from California Benchmarking Collaborative

Dear Chairman Weisenmiller and members of the California Energy Commission:

Thank you and the CEC staff for your proposed implementation plan of AB 802 for a statewide building energy benchmarking program. Energy efficiency is a critical strategy to address climate change and has been at the core of California's leadership on this issue.

In order to effectively implement and prioritize energy efficiency improvements, energy data transparency is essential to inform data-driven investments, and to understand where scarce resources should be deployed. The U.S. Green Building Council (USGBC) continues to support AB 802, and the efforts of CEC to develop a robust implementation plan, as a means to improve energy data transparency.

The California Benchmarking Collaborative, of which USGBC is a member, offered a detailed set of recommendations for CEC in public comments in December, 2015. In summary, the Collaborative:

1. Recommends the implementing regulations reflect the intent of AB 802 to provide broader access to energy usage information to support energy efficiency market transformation;
2. Strongly recommends the Energy Commission include buildings with 1-2 meters in the statewide benchmarking and transparency program;
3. Urges the Commission to not limit the number of accounts by fuel type;
4. Proposes definitions for and inclusion of mixed-use buildings;
5. Recommends adoption of meter mapping best practices; and
6. Supports the creation of stakeholder outreach and training resources, including a Benchmarking Help Center.

A set of comments was further issued by the Collaborative on August 12, 2016. In those comments, the Collaborative stated that we:

1. Strongly support the draft regulations released on July 18, 2016;
2. Offer recommendations to streamline customer permissions and building owner data requests;
3. Comment on inclusion of condominium buildings and proposed disclosure metrics; and
4. Provide specific recommendations for education, outreach, and training starting in 2016.



Thank you for your work on this important matter and for your consideration of these recommendations. USGBC and our sister organization, Green Business Certification, Inc. are tireless advocates for enabling informed decision-making through data transparency on energy and environmental performance. Through an expanded set of offerings (outlined below), we are better positioned than ever to support market transformation California's leadership on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Sigmon".

Jeremy Sigmon
Director, Technical Policy
U.S. Green Building Council

A handwritten signature in black ink, appearing to read "Brenden McEneaney".

Brenden McEneaney
Community Director, California
U.S. Green Building Council

More about the U.S. Green Building Council and Green Business Certification, Inc.

You can't manage what you don't measure. This is at the heart of USGBC's approach to steering our industry towards the design, construction, operations and management of better, greener buildings. The LEED v4¹ program for Building Operations & Maintenance² has energy and water performance measurement at its foundation with ENERGY STAR for buildings, and including references to a host of standards across multiple categories in the rating system. For newly-constructed buildings, LEED v4 requires installing building metering systems for both energy and water, and rewards projects for analyzing upstream and downstream impacts to enable more informed decisions about building designs, systems, and outcomes.

Across the country, USGBC and partners are working with cities and states to help unlock the power of information and data to enable informed decision making to optimize building operations, especially through greater efficiency in energy and water use.

For more than two decades now USGBC has continued to coach the marketplace that green building is not a one-time activity, a one-time tightening-of-the-belt, a one-time benchmark or measurement, or a one-time certification. Instead, it is a lifetime of continual performance monitoring, readjustment, and care.

USGBC is now also administering a new performance measurement and scoring tool called the LEED Dynamic Plaque,³ designed for all the things we can measure on an ongoing basis: energy, water, waste, transportation, and human experience. We believe this is the key to optimal building performance and the future of green building.

¹ For more information about LEED v4, see <http://www.usgbc.org/leed-v4>.

² For more information about the various LEED v4 rating systems for Building Operations & Maintenance, Building Design & Construction, or others, see <http://www.usgbc.org/leed>.

³ For more information about the LEED Dynamic Plaque, see <http://www.LEEDon.io>.



Beyond buildings, our sister organization, Green Business Certification, Inc. (GBCI), now oversees rating systems and certification programs that are defining, showcasing, and validating sustainability leadership in sectors beyond buildings.

These new areas of measurable impact include:

- Evaluating power system performance through efficient, reliable, and resilient power distribution and supply, through PEER;⁴
- Defining and measuring the performance of sustainable sites and landscapes that enhance ecosystem services and restore natural hydrology, through SITES;⁵
- Defining, measuring and recognizing high-performing, more sustainable garages and parking facilities through Parksmart;⁶
- Measuring, monitoring and certifying features of the built environment that impact human health and wellbeing, through WELL;⁷ and
- Transforming the way we assess Environmental, Social and Governance (ESG) performance of real assets globally, including real estate portfolios and infrastructure assets, through GRESB.⁸

We are very proud to take USGBC's and GBCI's proven and effective models for driving market change into these new sectors. Through this expanded set of tools, USGBC and GBCI continue our work to leverage market forces that value competitive differentiation and also to engage a diverse community of stakeholders that can grow business opportunities to invest in sustainability solutions.

⁴ For more information about PEER, see <http://www.gbci.org/certification#peer>.

⁵ For more information about SITES, see <http://www.gbci.org/certification#sites>.

⁶ For more information about Parksmart, see <http://www.gbci.org/certification#parksmart>.

⁷ For more information about WELL, see <http://www.gbci.org/certification#well>

⁸ For more information about GRESB, see <http://www.gbci.org/certification#gresb>.