

DOCKETED

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Environmental SAVE LLC Comments for AB802 - Edited Comment 05_21_24

A previous comment was entered stating that our company recommended not using BEAM.

The comment was based upon the configuration of the software by organizations around the country, as opposed to the full functionality of the software itself. After discussions with the developers company we would like to rescind our comment and restate that our true intent is to bring notice that 3rd party verifiers/providers should be considered when determining access and reporting.

For example, ownership & contacts are subject to change year over year. Portfolio Manager accounts pass along over time via shared logins. Individuals responsible for the creation of profiles may no longer be part of the organization. In some instances, the profile administrator may not be available to easily pass ownership to another entity.

In other cases, ownership identified in a profile may be several layers removed from the parties seeking to ensure compliance is met. We have even been subcontracted from another provider that assists the property management company, who in turn represents ownership.

The request for use of BEAM or any platform is to provide consistency in its configuration and use by state or local entities and to help 3rd parties completing compliance efforts to be able to review requirements, submit reports on behalf of another, review status of submissions, and confirm acceptance of submitted reports.