



BUILDING EMISSIONS REDUCTION AND DISCLOSURE ORDINANCE LISTENING SESSION MEETING NOTES DECEMBER 1, 2021

The purpose of this listening session was to get feedback and to hear questions from building owners and contractors who complete reporting under BERDO about reporting and data verification under the amended ordinance. The City presented an overview of the amended ordinance, the new reporting requirements for 2022, and a brief overview of the regulations development process. The presentation was followed by a listening session where participants shared their questions, comments, and concerns. The Listening Session had 108 participants.

The below notes are comments and questions made by participants.

Outreach/Engagement

- It would be helpful to have a similar listening session in March/April as people get into the nuts and bolts of reporting.
- We're looking at FY23 budgets now, so it's important to get information out now, especially about data verification.
- How will you be following up with information?
- Where is the website that shows which buildings currently comply with BERDO 1.0?
- There needs to be an educational program to bring people up to speed, especially tenants. Some tenants were told their building was in compliance by the owner, but BERDO data says it isn't.

Regulations Development

- Can you speak a little bit to the regulation-writing process (including who are the writers and final approvers) and how/when the Review Board will be decided?

Reporting through Portfolio Manager

- I need guidance on how to submit. I'm never sure if the report goes through.
- How do I upload utility data into BERDO?

B

- Is this reporting mechanism integrated with the Energy Star Tenant Portfolio Manager tool?
- We use a custom tool, but it was easy to work with the EPA to integrate it.
- We use a tool called [SIMAP](#) - it's a better setup for market-based reporting (RECs).
- Portfolio Manager is pretty good overall.

Square footage

- How do I verify square footage of a building? Is it the living area on the tax assessment website?
- Are owners encouraged to calculate square footage or are owners expected to use tax assessment data?

Individual building or portfolio

- The ordinance allows a portfolio approach but says that building owners must still report data individually for each building in the portfolio. What about campuses with their own power plant or other centralized energy distribution (steam, chilled water, electricity, etc.)? The buildings connected to these systems are often not separately sub-metered for each of these energy supplies.
- Is the reporting unit a building or is it an aggregate of buildings on a parcel? Do we need to assign parent-child relationships in Portfolio Manager?

Base year

- 2020 isn't a representative base year. Can building owners set a different base year?
- What kind of documentation will be required to use 2005 as a baseline?

Utility data requests

- Can utilities send out data on a yearly basis rather than making owners ask for it?
- For both the Eversource data portal or National grid email, it would be great to have that set up on a monthly basis to monitor it during the year.
- There's a way to connect to Eversource automatically through the sharing feature in Portfolio Manager
- Does the sharing feature in Eversource work for whole building usage data through the Energy Reporting and Disclosure portal? I know you can enroll in automated data feeds with Eversource for individual meters but not the whole building data file produced through the Eversource site used for whole building aggregated data.
- I have issues getting aggregated data from Eversource.
- My Eversource data issues eventually got cleared up a couple years ago.

B

- It was extremely difficult to obtain data from our utility companies last year.
- I'm a trustee of a condo association with 26 units, and I have difficulty getting energy reports from our three utilities (including Boston water and sewer).
- Does the utility data need to be vetted each time during submission, or can it be accepted as a source of truth?

Parking

- What category does a free-standing parking garage fall under?
- Will the energy use of large parking garages be included but not the square footage?

RECs

- What are the requirements for a New England ISO REC? We have several buildings that are metered separately on the same parcel. How can we properly report in these situations?
- Clarity is needed for how RECs will be reported. Portfolio Manager does not allow for market-based electricity emissions factors and the current BERDO guidance only references average regional emissions factors, not residual emissions factors (which goes against GHG accounting protocols for scope 2 market-based approach).
- It would be extremely helpful to have resources on what RECs are allowed, where to find them, and their prices. I had a lot of trouble finding sources of New England Power Pool regulated RECs (the ones that would be required?) online. Building owners will want to directly compare the price of RECs to that of Alternative Compliance Payments.
- Do you intend to favor RECs or ACP?
- Currently a MA Class 1 REC is about 75% of the cost per unit compared to an ACP, when comparing common units, but depends on the emissions factor
- I found MA SRECs in the range of \$250/mWh but ACPs equivalent to \$52/mWh

PPAs

- Will VPPAs outside of New England be allowed? (x2)
- Will VPPAs that result in additionality outside of New England be accepted towards the emissions cap? Is there a contract term limit requirement for the VPPA?

Emissions Factors

- How will emissions factors change over time? Following the technical methods manual? Central plant emissions factors should change, since electricity usage will improve.



- Targets were based on 2018 electricity emissions factors - do we use current emissions factors in Portfolio Manager, the 2018 number, or a projected number?
- For district steam, do we use a national emissions factor or Vicinity's emissions factor?

Third-Party Data Verification

- Who qualifies as a qualified energy professional? (x2)
- Qualifications for verifiers need to include carbon accounting expertise, not just an energy auditor. The renewable energy mechanisms (PPAs, RECs, etc) are sophisticated and require a level of technical expertise that is different from auditing a building for energy performance.
- Is there some specific checklist of items for the professional to review?
- It would be helpful if BERDO could supply a list of qualified energy professionals. (x3)
- For third party verification, it seems having a licensed engineer or a certified energy manager is typical in other geographies; it'd be great if a lower-cost solution were available for BERDO 2.0.
- Does the verification in 2022 apply to buildings that were reporting under 1.0 as well? Meaning not just buildings complying under 2.0 for the very first time?
- What happens if you make a mistake in reporting?
- There's a benefit to having a verification requirement, because there's so much garbage that comes in with these reporting requirements.
- Could there be a list of professionals that would provide pro bono services to nonprofits or other buildings that can't afford it?
- Would a recent energy audit count as third-party data verification or does every building have to verify the data this year?

Review Board

- When is the nomination process for the Review Board happening?
- How can people put themselves forward for the review board?
- How will the emissions review board be processing and managing applications for the individual compliance method, hardship compliance, and other special scenarios? I imagine this will require a significant level of administrative work. When do owners submit these applications for CY2025 compliance? And at what point should owners expect approval/denial?
- The amendment states that individual compliance schedules must be approved by the review board and that the review board may include additional conditions on



the approval of individual compliance plans. What kind of additional conditions are envisioned here?

- How do I get approval for a blended rate?

Condos

- As a condo resident with a 16-year old natural gas heating system, would we be forced to replace it before its time? Also, are there pathways available to gradually change from gas to electric without having a huge investment in both systems halfway through the changeover? (Especially important in planning our replacement reserves timeline.)
- How is a board responsible for energy uses or energy changes that an owner may have? What control does a condo association have over individual owners? Where does responsibility lie in a condo situation?

Tenants

- If there is separate metering for each resident or tenant, with the resident or tenant controlling the energy use, how would the building owner fulfill the responsibility to reduce energy use according to the BERDO schedule?
- How do we get tenant data or reduce tenant energy use?

New construction

- Clarity is needed to describe how new construction projects (subject to the ZNC zoning) will be reporting their ongoing performance once operational (they have different targets than those of BERDO). This is particularly relevant for organizations using a portfolio approach.
- Interaction between ZNC standard and BERDO? What happens to a new building?
- If we're estimating or budgeting now, how will new construction projects interact with BERDO?

Misc.

- For a portfolio that fell into the 2014/2019 BERDO 1.0 cycle, will that same portfolio be required to comply in 2024 prior to the 2025 BERDO 2.0 compliance schedule?
- Will BERDO allow for renewable natural gas (as a bridge fuel until a building can be made all electric)? This should be articulated in the regs.
- How can a building owner confirm if their building is required to report?