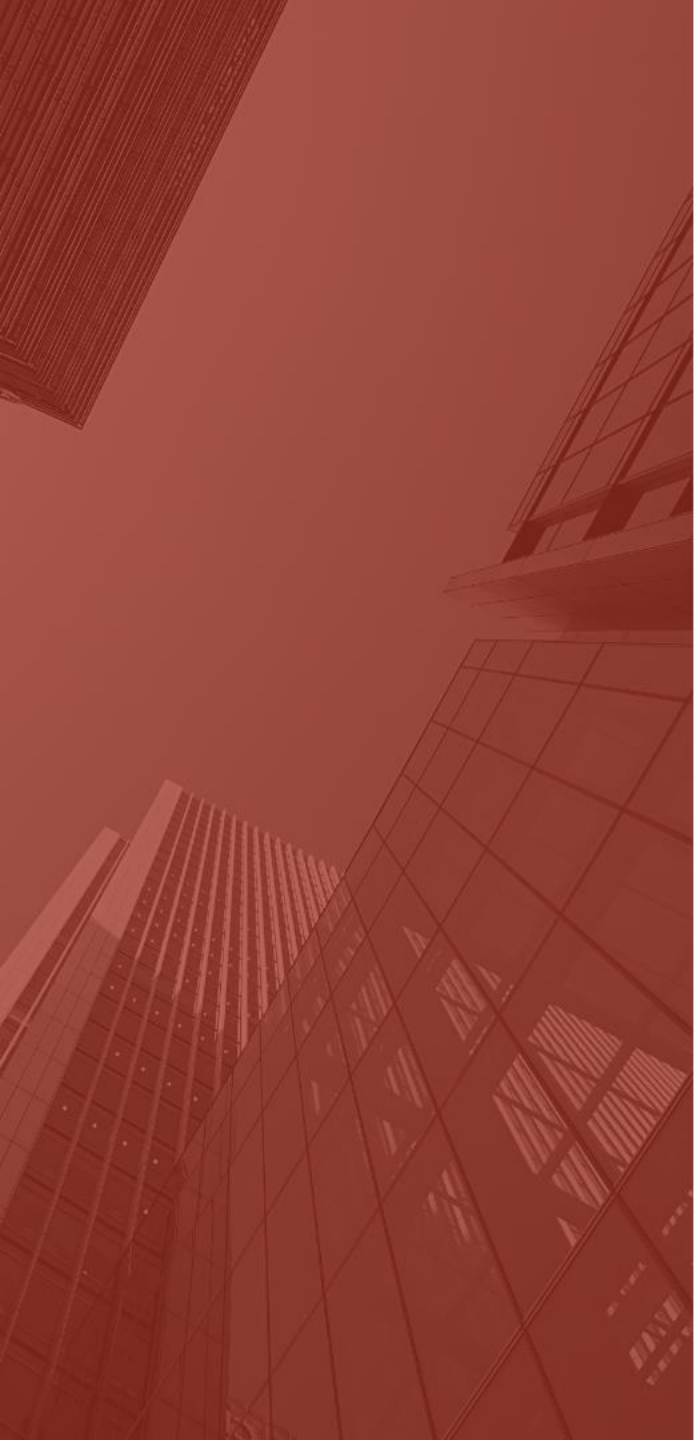


Introduction to Maryland Benchmarking for Montgomery County Properties

February 7, 2025

AOBA
APARTMENT AND OFFICE BUILDING ASSOCIATION OF METROPOLITAN WASHINGTON

How familiar are you with Maryland's benchmarking requirements?

Meet Our Speakers

Chris Pendley
Director of Sustainability Policy & Strategy
AOBA

Emily Curley
Building Energy Performance Programs Manager
Montgomery County Department of Environmental Protection

Samuel Furio
Outreach Coordinator Building Decarbonization Team
Maryland Department of the Environment

AOBA
APARTMENT AND OFFICE BUILDING ASSOCIATION OF METROPOLITAN WASHINGTON

Agenda

- Scene-Setting
- Benchmarking Discussions
- Q&A

Montgomery County

Maryland

Both Programs Signifier

AOBA
APARTMENT AND OFFICE BUILDING ASSOCIATION OF METROPOLITAN WASHINGTON

How many buildings could benchmarking apply to?

Montgomery County	
Covered MF	**Covered MF GFA**
About 500	107 million
Covered Offices	**Covered Office GFA**
About 400	55 million

Maryland	
Covered MF	**Covered MF GFA**
About 450	76 million
Covered Offices	**Covered Office GFA**
About 450	61 million

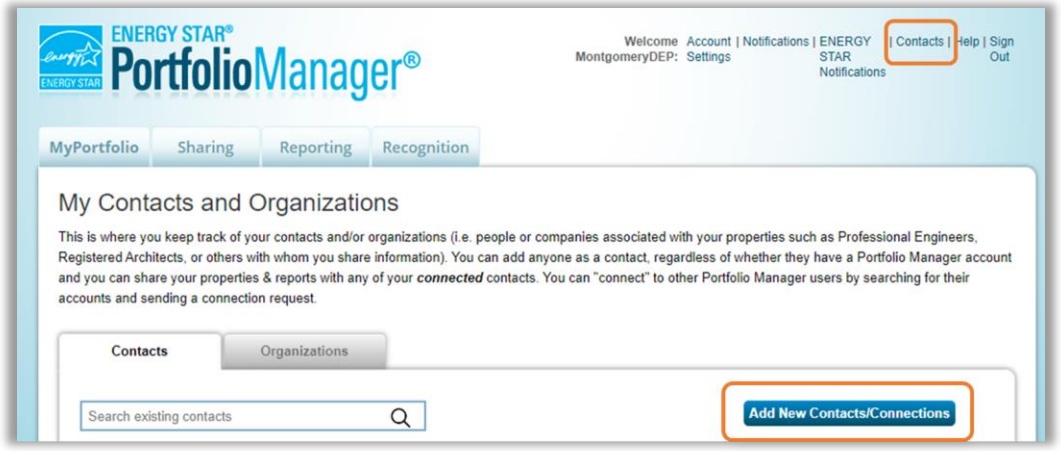
AOBA
APARTMENT AND OFFICE BUILDING ASSOCIATION OF METROPOLITAN WASHINGTON

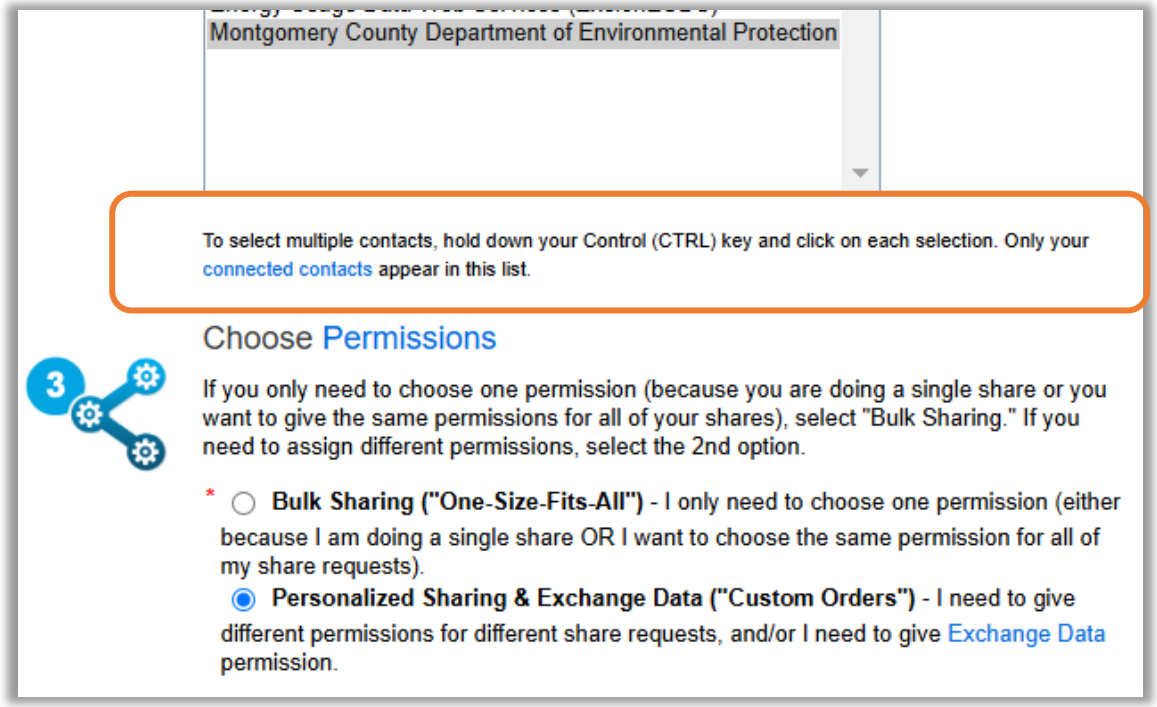
Program Alignment

Sharing Your Building(s) in ENERGY STAR Portfolio Manager

Both Programs

- You can connect and share your building in ENERGY STAR Portfolio Manager with both Montgomery County (**MontgomeryDEP**) *and* MDE (**MD-BEPS**).



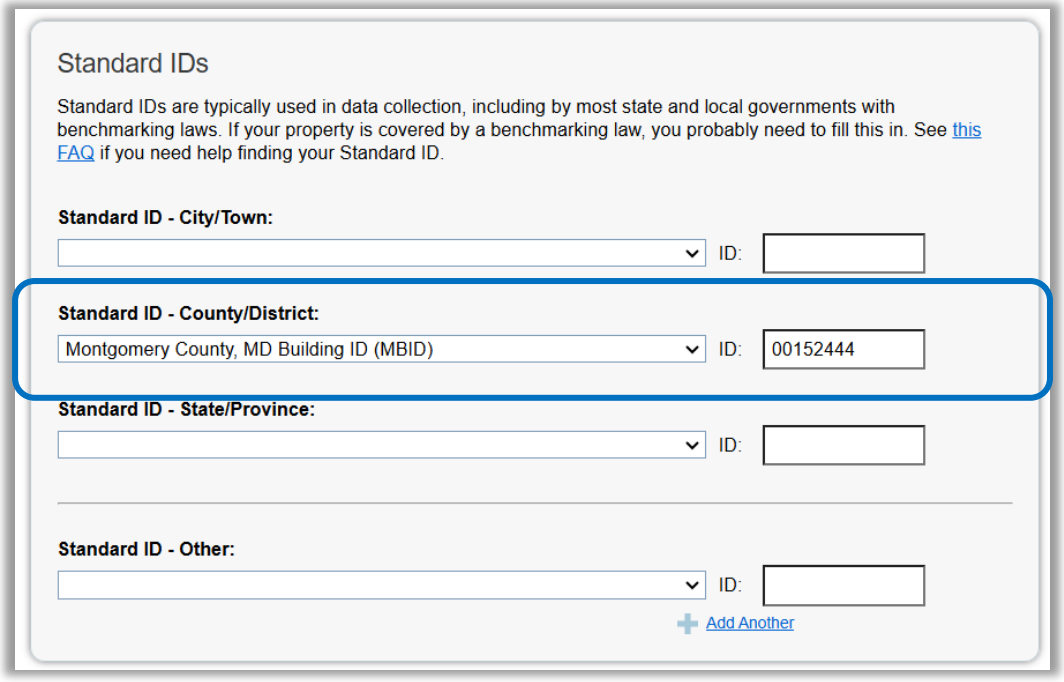


Takeaway: You can share a building with *both* Montgomery County and MDE.

Entering the Building's Unique IDs into ENERGY STAR Portfolio Manager

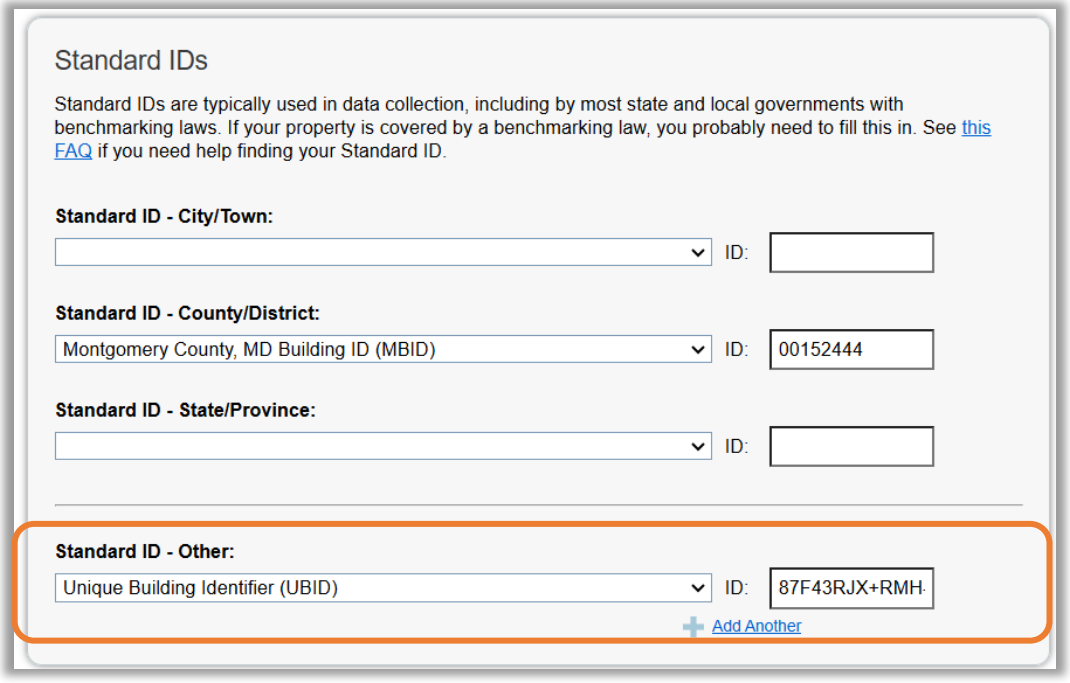
Montgomery County

- The Covered Buildings Inventory lists each building's unique Montgomery County Building ID (MBID)



Maryland

- The BEPS Portal lists each buildings Unique Building Identifier (UBID)



Takeaway: Your existing Portfolio Manager building profile can be tagged with both the County and State's unique ID

Alignment in Benchmarking: Requesting Aggregated Data

Both Programs

- You will need whole-building energy data from all energy meters supplying the building to benchmark properly in Portfolio Manager. This includes both common area and tenant meters.
- Many Montgomery County building owners have already requested aggregated data and synced the utility data feed with Portfolio Manager.
- If the aggregated data already covers the whole building, you are done.

Takeaway: If you are already reporting aggregated, whole building data, there is no need to re-request this information from the utilities.

Alignment in Benchmarking: Renewable Energy

Both Programs

Utility electricity bills do *not* contain all the information necessary to benchmark your onsite renewable energy use. You will need at least two electricity meters: One or more meters to track the total amount of electricity purchased from the grid; and one meter to track renewable electricity generated onsite. Enter:

- **Grid delivered electricity**
- **Renewable energy generated on-site**
  - **Renewable Energy Used On Site**
  - **Renewable Energy Exported Offsite**

Montgomery County

- Montgomery County provides a “renewable energy allowance” for onsite renewable energy generation as a credit towards the final performance standard.

Maryland

- No application for renewable energy use in statewide BEPS as it doesn't reduce on-site direct emissions

Takeaway: Reporting renewable energy is the same for both programs.

Alignment in Benchmarking: Parking, EV Chargers, and Pools

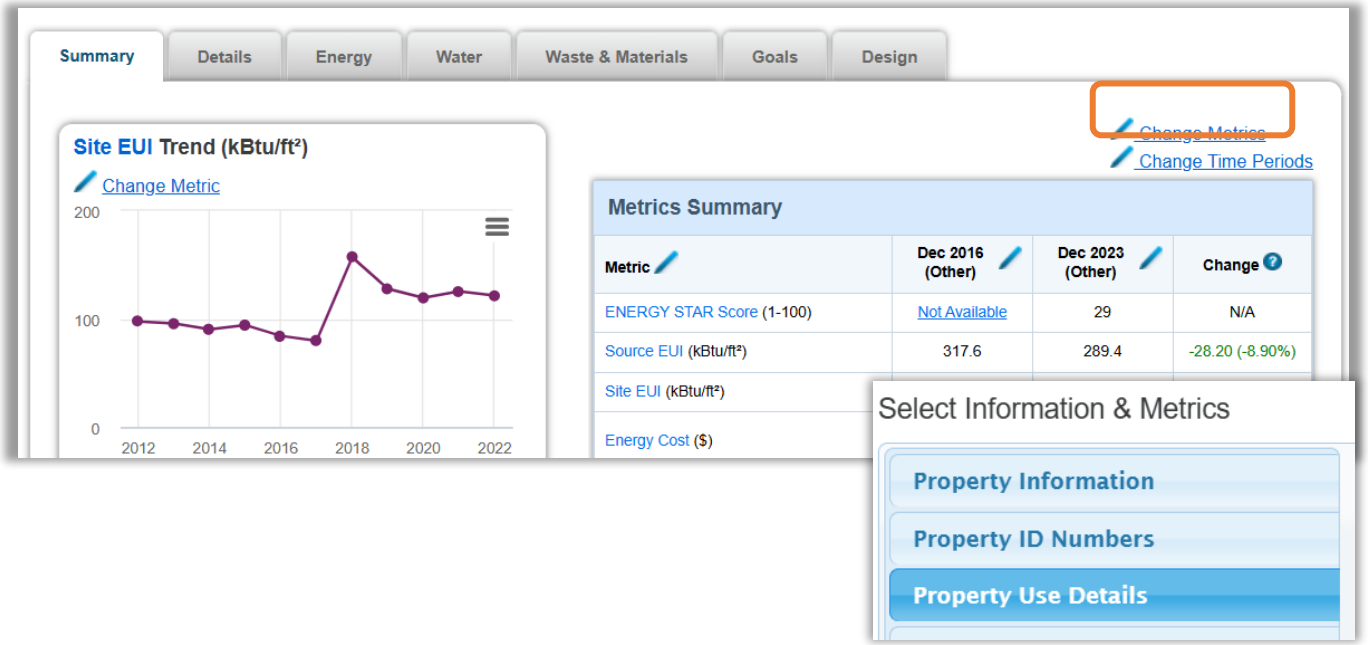
Both Programs

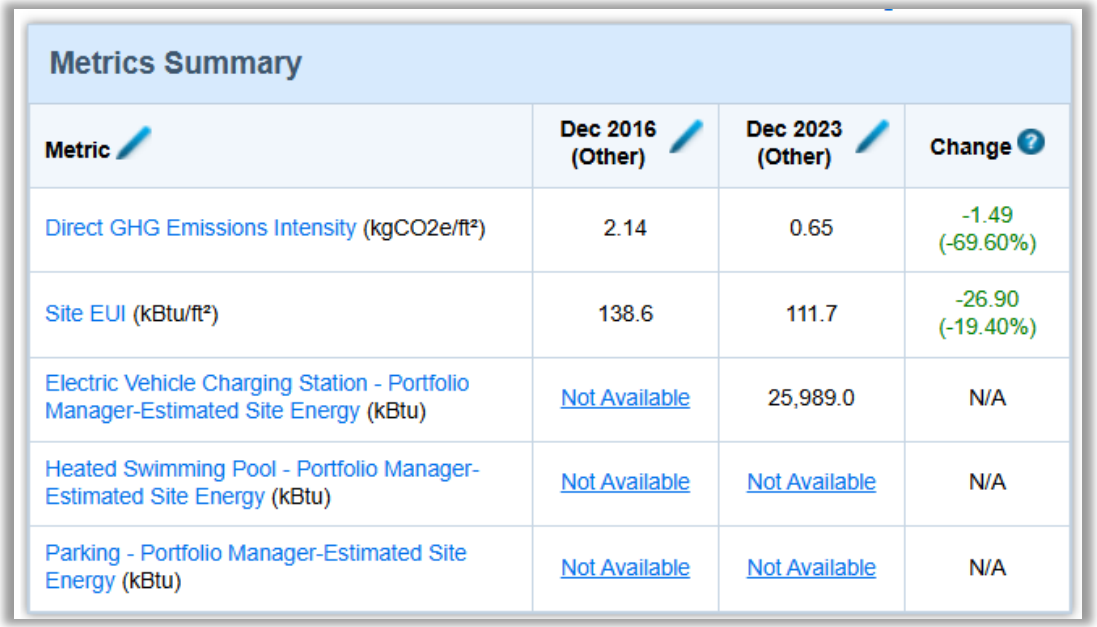
- **Rule of thumb:**
  - **Separately Metered:** If these uses are on a separate meter, they should be excluded from your benchmarking report.
  - **Submetered:** If these uses are submetered, they can be subtracted from your benchmarking report (see EPA's guidance Can I add a negative meter to subtract parking/cell towers/EV charging stations/etc?). In these cases, do not report the parking GFA or enter information about EV chargers or pools in the building, since you are not reporting energy use for those.
  - **On the Main Meter:** If these uses are a part of the building and the energy use is not able to be excluded from the Benchmarking Report, you will need to report more details about each of these spaces:
    - **Parking**: Enter GFA by each type of parking (Fully Enclosed, Partially Enclosed, and Open) and indicate whether or not there Is supplemental heating. See EPA's **How do I enter parking?** help desk article for additional guidance.
    - **EV Chargers**: Enter the number and type of EV charging stations. See EPA's **How do I enter swimming pools and hot tubs?** help desk article for additional guidance.
    - **Heated Swimming Pools**: Enter information on the approximate pool size, location of the pool, and months in use. See EPA's **How do I benchmark my EV Charging Stations/EV Chargers?**

Takeaway: Benchmarking and reporting parking, EV chargers, and heated swimming pools is the same for both programs.

Finding ENERGY STAR Portfolio Manager Estimated Energy Data

- Portfolio Manager calculates estimates of annual site energy use for parking, EV chargers, and pools.
- Both jurisdictions will use these Portfolio Manager estimates (if they're not already submetered or excluded) to make calculations that impact building energy performance standards.
- How to add these estimates to your Portfolio Manager Metrics Summary:





Metrics Summary

Metric	Dec 2016 (Other)	Dec 2023 (Other)	Change
Direct GHG Emissions Intensity (kgCO2e/ft²)	2.14	0.65	-1.49 (-69.60%)
Site EUI (kBtu/ft²)	138.6	111.7	-26.90 (-19.40%)
Electric Vehicle Charging Station - Portfolio Manager-Estimated Site Energy (kBtu)	Not Available	25,989.0	N/A
Heated Swimming Pool - Portfolio Manager-Estimated Site Energy (kBtu)	Not Available	Not Available	N/A
Parking - Portfolio Manager-Estimated Site Energy (kBtu)	Not Available	Not Available	N/A

Takeaway: Entering accurate information about these use types is critical as it impacts building energy performance standards calculations.

Food Service Facilities

Maryland

*"(a) **"Food service facility" means:***
(i) A place where food or drink is prepared for sale or service on the premises or elsewhere; or
(ii) An operation where food is served to or provided for the public with or without charge.
(b) "Food service facility" includes:
(i) A restaurant, coffee shop, cafeteria, short order cafe, luncheonette, tavern, sandwich stand, soda fountain, retail market, or retail bakery outlet;
(ii) A food operation in an industry, institution, health care facility, club, school, camp, church, catering kitchen, commissary, or a similar place in which food or drink is prepared for sale or for service on the premises or elsewhere; and
(iii) A micro market licensed under Business Regulation Article, Title 17, Subtitle 17, Annotated Code of Maryland, and meeting the requirements of this chapter as a food service facility.

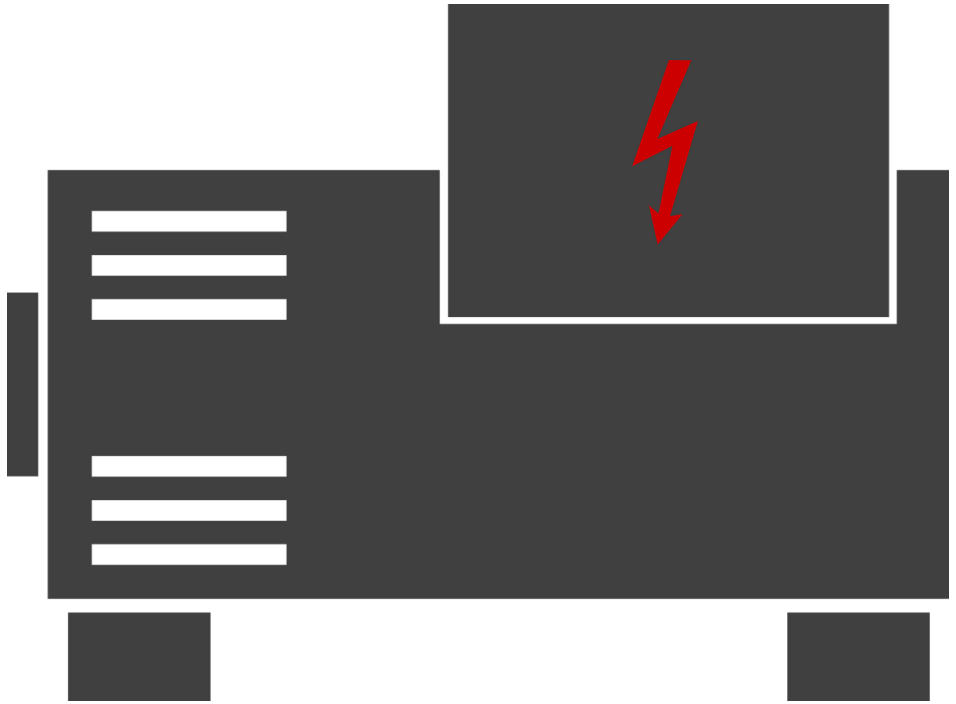
- Energy use associated with food service facilities can be excluded from your state report
- Guidance on exclusion can be found in the benchmarking guide

Takeaway: You can use custom fields to report commercial cooking area / emissions that are not separately metered without having to create a new building in ENERGY STAR Portfolio Manager.

Unique to State Law: Combustion Equipment Required by Law

Maryland

- Emissions from combustion equipment/generators can be excluded if a federal or State regulation requires it to run on combustible fuels.
- If the state or federal regulation is amended to allow for battery storage/and/or other types of systems that do not produce direct emissions, then these emissions will need to be included.



Takeaway: You'll need to submit a form to have these related emissions approved to be exempted from your building(s) profile

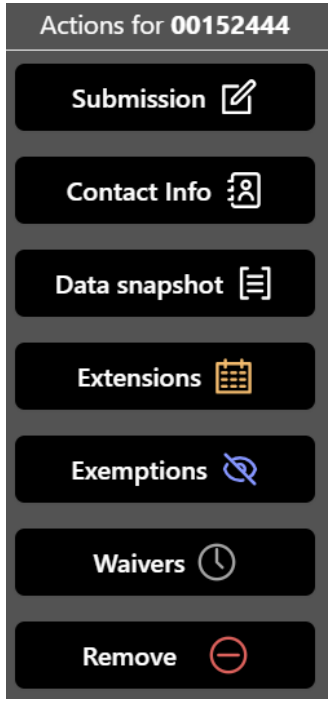
Submitting Your Benchmarking Report

Montgomery County

- After entering data into ENERGY STAR Portfolio Manager, Montgomery County requires building owners to submit the via the Montgomery County Building Energy Benchmarking Reporting Portal.

- This Portal is where building owners / consultants can:
  - Claim buildings
  - Submit waiver / exemption / extension requests
  - Submit annual benchmarking submissions
  - Update contact information
  - View reporting status
  - View snapshot of reported data

- **Submission deadline is June 1 each year**



Maryland

- MDE will automatically pull data from buildings that have connected and shared with MDE in Portfolio Manager on the reporting deadline.

- Submission deadline is Sept 1, 2025 and then June 1 in subsequent years.

Takeaway: There is a final step to reporting data to Montgomery County.

Data Verification

Data Verification: Overview

Montgomery County

- Required by law
- Roughly two dozen accepted verification credentials, including all credentials accepted by MDE.
- Third party verification not required. Verifier can be the same as the benchmarker or within the same company as the benchmarker.
- Alternatively, ENERGY STAR Certification for at least 6 months of the calendar year being benchmarked.
  - ENERGY STAR Certification requires verification by a licensed PE or Registered Architect (RA)

Maryland

- Required by regulation
- Building owners must have data verified by a third party.
- If you are using a third party to benchmark your building(s), this party can also be the third party verifier. If you are using internal staff to benchmark, they cannot act as a third party verifier.
- Accepted credentials:
  - Professional Engineer (PE)
  - Licensed Architect
  - Certified Energy Manager (CEM)
  - Building Energy Assessment Professional (BEAP)

Takeaway: Following State requirements for third party verifications and credentials will also meet County requirements.

Data Verification: Timing

Montgomery County

- Montgomery County requires data verification the first year that a building benchmarks and every 3 years thereafter.
- Building owners will be alerted if building is due for verification via the Benchmarking Reporting Portal.

Maryland

- Building owners must have data verified by a third party every five years.

Calendar Year Data Being Verified	Verification deadline MDE
2025	June 1, 2026
2030	June 1, 2031
2035	June 1, 2036
2040	June 1, 2041
Every 5 years following this pattern	

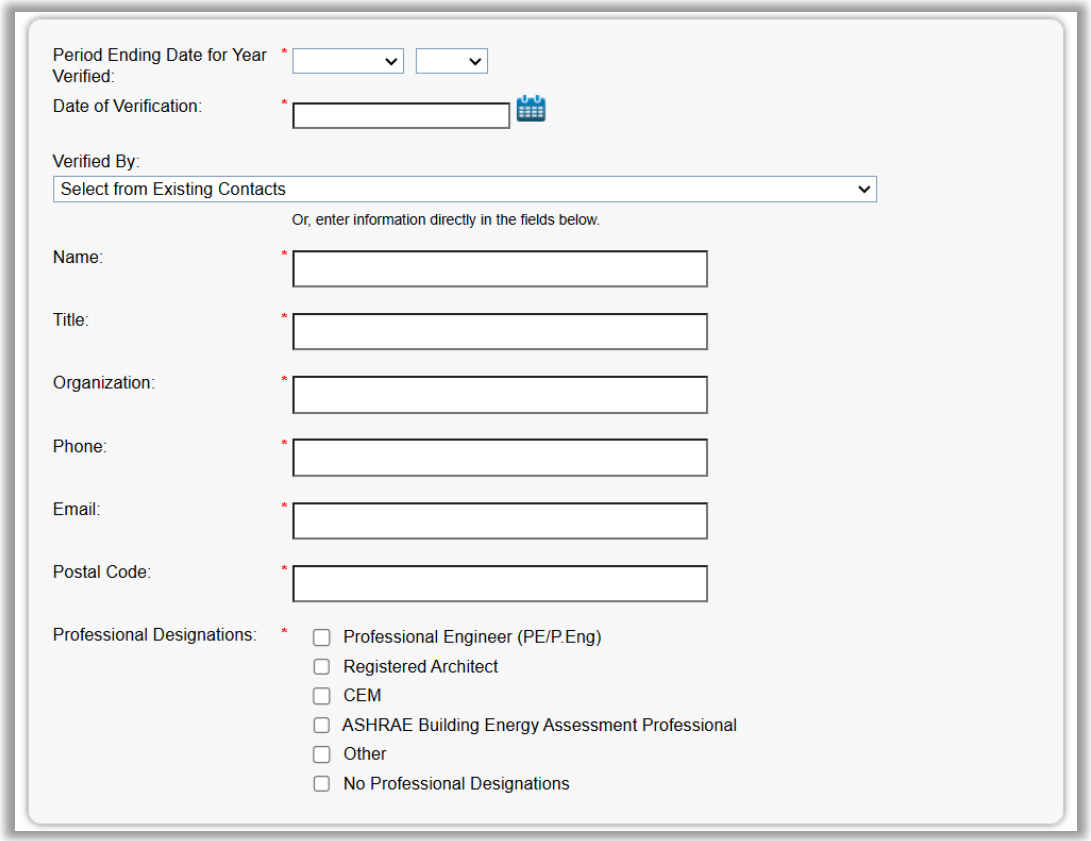
CY:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Group 1		X			X	X			X		X			X
Group 2	X			X		X			X		X			X
Group 3 & 4			X			X			X		X			X
Group 5				X		X			X		X			X

Takeaway: Verifying for State compliance resets the County's 3-year verification requirement.

Data Verification: Reporting in ENERGY STAR Portfolio Manager

Both Programs

- Once verification is completed, verification information must be entered in the Verification fields on the Details tab in Portfolio Manager.



Takeaway: The process for reporting verification information is the same for both programs.

Maryland: Unique Building IDs

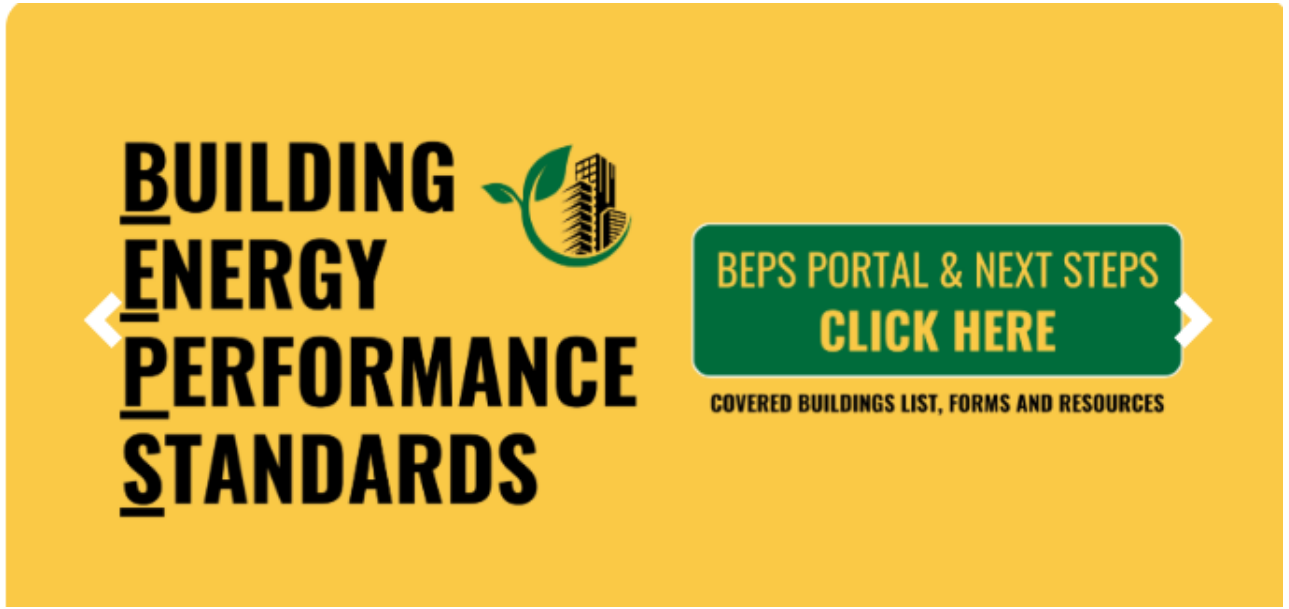
Unique Building Identifier (UBID)

Maryland

- Every building and/or grouping of buildings gets their own unique building identifier (UBID)

- You'll need the UBID to comply with MDE's BEPS, whether that be for benchmarking and reporting, or applying for an exemption

- Can't find your building(s) and UBID(s)? You'll need to submit a form to add your building(s) to the list



Exceptions, Exemptions, and Edge Cases

What is a Building?

Montgomery County	Maryland
• Montgomery County allows owners to omit spaces that are <25k sf, individually metered for all utilities, separate energy systems, and share no interior area (like hallways or stairwells).	·A single building, as defined by the building's "envelope"; ·One or more buildings held in the condominium form of ownership and governed by a single board of managers; or ·Two or more buildings that are served in whole or in part by the same electric or gas meter or are served by the same heating or cooling system or systems, which is not a district energy system.

Takeaway: Some sites reported to County may need to add meters/spaces to complete reporting per MDE's definition of a building. Others may be exempt from County reporting but need to comply with MDE's requirements.

Campus Compliance

Maryland

Campus compliance allows building owners to:

- Aggregate all buildings on the campus and meet a campus wide BEPS standard
- Decide which buildings should be upgraded to meet aggregate standard

Campuses have two options:

- Report only covered buildings on campus, including any district energy use (standard pathway)
- Report as a campus, including all buildings/energy use on the campus (campus pathway)

Is my building covered by the law?

Montgomery County	Maryland
• County law covers most commercial and multifamily buildings **25,000** gross square feet and larger • DEP's Covered Building Inventory lists all covered buildings. • As of 2024, all covered buildings are required to benchmark annually.	• State law covers most commercial and multifamily buildings **35,000** gross square feet and larger • MDE Covered Buildings List in the BEPS Portal • Certain exemptions can be applied for, ranging from partial to total exemption

Takeaway: Many, but not all buildings covered by County law are also subject to State benchmarking requirements.

Are There Any Exemptions to the Law?

Maryland

Total Exemption Apply Once

Designated Historic

Agricultural

Elementary & Secondary Schools

Demolished

Manufacturing

Federally Owned

ACP Adjustment
Apply Annually

Reduced Alternative Compliance Payments (ACP) for Affordable Housing

Total Exemption
Apply Annually

Financial Distress

Not Occupied

Baseline Exemption
Apply Annually
(Max 3 Times)

Low Occupancy
< 50%

Takeaway: Some buildings (like K-12 schools and manufacturing buildings) are subject to County law but not State law.

Exemption Applications

Maryland

Currently Available

- BEPS Benchmarking + Performance Standard Exemption Request: Historic Building
- BEPS Benchmarking + Performance Standard Exemption Request: School Building
- BEPS Benchmarking + Performance Standard Exemption Request: Manufacturing Building
- BEPS Benchmarking + Performance Standard Exemption Request: Agricultural Building
- BEPS Benchmarking + Performance Standard Exemption Request: Federal Building
- BEPS Benchmarking + Performance Standard: Exemption Request: Under 35,000 ft2
- BEPS Benchmarking + Performance Standard Exemption Request: Demolished Building
- BEPS Benchmarking: Request for a Unique Building Identifier (UBID)

Coming Soon!

- Unoccupied
- Combustion Equipment
- Food Service Facility
- Baseline Establishment Delay
- Campus Compliance Pathway
- Campus building not owned by principal owner
- District Energy Systems

Special Notes

- Have a parking garage or other non covered building(s)? **Submit** "**Under 35,000 ft2**"
- Square footage or property type incorrect or listed as unknown in portal? No need to request for a change, MDE will adjust based on ESPM submissions.

Tools and Resources

Montgomery County

- Benchmarking website provides information and resources on benchmarking and reporting.
- DEP staff can be reached at Energy@MontgomeryCountyMD.gov with questions or to set up a virtual help session.
- Montgomery County building owners may be eligible for support via the Montgomery County Green Bank's Technical Assistance Program for benchmarking, data verification, gross floor area measurements as well as energy efficiency and electrification feasibility assessments.
- After reporting, the Montgomery County Building Energy Performance Map is an interactive and user-friendly tool to investigate compliance status and energy performance data for each covered building.

Maryland

MDE

- Benchmarking Guide
- Website
- Portal
- Connecting with your energy data provider
- YouTube playlist
- Email List & Webinar Access
- Email at beps.mde@maryland.gov

MEA Clean Buildings Hub

- Website
- Newsletter

What did we not cover you have a question about?

Thank You!

Chris Pendley
Email: cpendley@aoba-metro.org
T: (202) 296-3390 - Ext. 209 | M: (202) 809-6512

Energy@MontgomeryCountyMD.gov | BEPS.MDE@Maryland.gov