APARTMENT AND OFFICE
BUILDING ASSOCIATION
OF METROPOLITAN
WASHINGTON

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The Energy Certification and Green Leasing Grant provides funding for energy conservation measures that achieve ENERGY STAR Certification. When combined with EmPOWER Maryland incentives, this grant can significantly reduce the costs associated with upgrades and assist building owners in complying with BEPS.

# 2025 Prince George's County Benchmarking Resource

## Introduction

As part of the Climate Solutions Now Act (CSNA), office and multifamily buildings over 35,000 square feet will need to benchmark and disclose their energy usage to Maryland's Department of the Environment (MDE). Energy Benchmarking is the process of tracking a building's energy use and using standard metrics to compare a building's performance against itself year-over-year.

This process begins in 2025 using 2024 data. Benchmarking results for 2025 are due to MDE no later than September 1, 2025; future years' benchmarking reports will be due no later than June 1. MDE has produced a comprehensive benchmarking guide AOBA members are strongly encouraged to review and follow.

This companion document is intended to help AOBA members in Prince George's County, Maryland learn some best practices around benchmarking, which can be helpful if benchmarking is new to the property. This document will help outline a few additional best practices and tips:

1. Key interim deadline dates
2. Getting help from Associate or Professional AOBA members
3. Using the Maryland Building Energy Performance Standards (BEPS) Portal
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AOBA is sending this document to the primary contact for your member company. If you are not the person responsible for benchmarking your Prince George's County properties, please pass this document along to the relevant party.

## Key Dates

Benchmarking is a multi-step process. Successfully navigating benchmarking for your property may require, in effect, working backwards from the 2025 benchmarking deadline of September 1.

The table below contains key completion milestones for benchmarking for your properties.

| Task Number | Task Name | Complete By |
|---|---|---|
| Appendix I | If applicable, determine how your garden-style properties benchmark | May 9, 2025 |
| 1 | Identify if you need outside benchmarking help | May 9, 2025 |
| 2 | Collect common area and tenant meter numbers | May 15, 2025 |
| 3 | Set up ENERGY STAR Portfolio Manager Entries | May 15, 2025 |
| 4 | Submit aggregate meter data requests | May 20, 2025 |
| 5 | Review the Maryland BEPS Portal and adjust your buildings if you need to | June 1, 2025 |
| 6 | Confirm space characteristics, including gross floor area (GFA) | July 1, 2025 |
| 7 | Submit benchmarking to MDE | September 1, 2025 |

## Task 1: Identify if you need outside benchmarking help

If you do not have the time or capacity to delve into benchmarking details for your PG County property, AOBA has numerous [Associate and Professional Members](#) who can help you in your energy benchmarking process.

That being said, it is also good practice to know what a successful benchmarking process looks like. Familiarity with the process is recommended for two reasons:

1. Some benchmarking providers might ask owners to complete forms or provide onsite information.
    b. For example, some benchmarking providers may complete forms in the Maryland BEPS Portal on your behalf while others would ask for you to complete those forms.
    c. In addition, some companies may ask you to provide gross floor area and key space characteristics while others may collect that information for your building on your behalf.
2. Knowledge of the benchmarking process will help you evaluate the success of the benchmarking effort.

## Task 2: Collect common area and tenant meter numbers

Some utilities can be able to provide a list of meters they see at your address. However, this is not always the case. For example, Washington Gas requires you to collect all common-area and tenant meter numbers at your property. BGE and Pepco do not require you to collect meter numbers but do require you to know the service address(es). For aggregate data requests to either BGE or Pepco, collecting common area meter service address(es) should be sufficient.

## Task 3: Set up ENERGY STAR Portfolio Manager entries

MDE has produced a [comprehensive benchmarking guide](#) AOBA members are strongly encouraged to review and follow the steps in this guide for setting up a Portfolio Manager entry if they have not done this before.

## Task 4: Submit aggregate meter data requests

Once you collect your meter lists (you will need one for electricity and one for gas if you have both electricity and gas), you will need to submit these lists to your utility/utilities. Utility companies will want to see these requests tied to the service address(es). This process is unique by utility and can be seen at a high level in MDE's [Connecting With Your Energy Provider Document](#).

- **Pepco** (page 13) customers can find information on getting their Pepco data at [Pepco Energy Benchmarking](#). Pepco will ask you to provide service addresses and will provide meter numbers for those addresses; you will need to provide one meter number (use a common area meter).
- **Washington Gas** (page 20) customers can find information on getting aggregated gas bill data at [Washington Gas Energy Benchmarking](#). Washington Gas will ask you to provide meter numbers for your property, including both common area and tenant meters. However, Washington Gas does not require service addresses.
- **SMECO** customers can find information on aggregate data through [SMECO's Benchmarking Tool](#). SMECO will ask you to provide service addresses and will provide meter numbers for those addresses; you will need to provide one meter number (use a common area meter).
- **BGE** (page 6) offers information on getting BGE electric and gas data at [Automated Benchmarking](#). BGE will ask you to provide service addresses and will provide meter numbers for those addresses; you will need to provide one meter number (use a common area meter).

As part of the aggregation request, the utility will provide your ENERGY STAR Portfolio Manager entry with anonymized, aggregated data and will provide you (or your benchmarking provider) with a list of the meter numbers that were aggregated. However, it is up to you to make sure that the provided meter list from the utility is correct.

If the list is incorrect, the utility would rely on you to help them correct this data. Fully vetting and correcting a list of hundreds of meters can be a time-intensive process. Fully completing this effort may be something that needs to fall into the 2026 verification effort.

However, there are two quick things you can do:

1. Does the utility have the correct number of meters at your property? For multifamily properties, "number of units plus number of common area meters" is a good heuristic.
2. Does the utility aggregate data include a retail space that could otherwise be excluded? This would likely be a restaurant.

The utility will need to provide correct aggregate meter data for your property. Performing those spot checks in 2025 will help you capture obvious issues, at which point you would need the utility to provide correct data. If this is the case, you should document this situation to MDE so they are aware.

Looking ahead to 2026, it can be a useful effort to collect meter photos in 2025 that clearly show the number on the meter. In 2026, the verifier can then check the meter numbers at your property against the meter list provided by the utility to ensure the list is complete and correct.

## Task 5: Review the Maryland BEPS Portal and adjust your buildings if you need to

If you have a building in Prince George's County, particularly if the leasable square footage is over 30,000 square feet, AOBA recommends that you identify if the building is in the Maryland BEPS Portal. The Maryland BEPS Portal database was populated by MDE based on county-level data. It is the responsibility of the building owner to determine if their building is covered.

That being said, the data in the Maryland BEPS Portal may not accurately reflect your building(s). MDE has a couple of forms to address these gaps:

1. If your building isn't listed in the Maryland BEPS Portal but should be, a **UBID request form** is available once you create an account on the Maryland BEPS Portal. **It is strongly recommended that UBID requests go submitted to MDE no later than June 1.** UBIDs need to be manually created by MDE and the process takes time.
   - The most complex part of this process is identifying the longitude and latitude of your property via Google Maps, but the BEPS Portal contains instructions on how to do this.

2. If your building is listed in the Maryland BEPS Portal but shouldn't be, a Categorical Exemption Form can be completed. Use the "Under 35,000 square feet" form. Submitting this form may require some supporting documentation such as
   - Garden-style multifamily properties may have multiple entries listed at the same address. If this is the case, it is recommended to review and complete the "Best Practices for Garden-Style Multifamily Properties" section of this document first. Results from that analysis can be used to help complete the Categorical Exemption Forms you may need.
   - In most cases, one entry per address is reasonable.

## Task 6: Confirm space characteristics, including gross floor area

This entails two items:

1. Measure the gross floor area of each covered building, ideally using the documents like architectural drawings or surveys. If those documents are not available, you may need to make your best estimate this year using aerial images (e.g., Google Maps). If you need to do this, you should plan for your 2026 third-party verification effort to dig in more to figure out covered building gross floor area.
2. Collect relevant space characteristics based on your primary property space type(s).

If you are following the guidance for garden-style multifamily buildings, this is a repeat of Step 5.

## Task 7: Submit benchmarking to MDE

MDE has produced a [comprehensive benchmarking guide](#) AOBA members are strongly encouraged to review and follow the steps in this guide in order to successfully submit their benchmarking requests to MDE.

## Appendix I: Best Practices for Garden-Style Multifamily Properties (if applicable to your property)

Garden-style multifamily properties are properties that have multiple low-rise buildings within the same property, where a low-rise building is a property that is four or fewer stories counting any basements. While the conventional approach to benchmarking may treat all these buildings under the same ENERGY STAR Portfolio Manager entry, in practice this would mean that some buildings that may not otherwise be subject to BEPS are subject to BEPS. As a result, it makes sense to take a systematic approach to how you benchmark your garden-style properties.

### Step 1: Identify Common or Shared Systems

In this parlance, a common or shared system has two possible applications:
1.  This could mean an energy-using system. This would be a central space heating plant, central space cooling plant, or central domestic hot water plant.
2.  This could also mean shared, enclosed spaces within the property. If a walkup has a door, and the stairwell is enclosed (e.g., it has a door to the outside), the stairwell is a shared space for that building. If there are fully enclosed walkways between buildings, those two buildings are connected by the walkway and benchmark together.
    *   Conversely, if buildings are physically separate, then they do not benchmark together unless they share a common energy-using system.
    *   Similarly, if a walkup does not have a door and is an open stairwell, that means that space is not included in the square footage of the building.
3.  This could also mean shared utility services. This is probably uncommon for electricity but can happen with gas. (Common water meters do not factor into this discussion.)
    *   If an apartment has their own electric meter and their own gas meter, then it is considered to have separate energy systems from other apartments. Garden-style properties with apartments that have their own electric and gas meter benchmark based on the shared common areas in the building—e.g., stairwells or basements.
    *   If apartments are served from a common electric or gas meter, then any apartments served from the same meter(s) would benchmark together. While this sounds confusing in concept, in practice for the vast majority of properties this is likely "one electric meter per building" or "one gas meter per building."

**Based on the above, you should start by answering the following questions.** These questions are generally applicable to most garden-style properties:
1.  Do any of the buildings in your garden-style property share common energy-using systems?
    *   If they do, any buildings that share a common energy-using systems need to benchmark together. Group those buildings together and move on to Step 2.
    *   If they do not share any energy-using systems, proceed to the next question in this section.
2.  Do apartments have their own electric and gas meters?
3.  How are common area(s) meters configured? These would include electric or gas meter(s) that serve any hallways, stairwells, or other common areas.
    *   If each common area meter serves its own building, you can generally treat the buildings separately unless they have any common energy-using systems.
    *   If a common area meter serves multiple buildings, then you benchmark those buildings together.
4.  Do any shared, enclosed spaces within the property require buildings to benchmark together that have separate energy systems?
    *   This is uncommon but in some cases a shared stairwell, basement, or fully enclosed walkway could connect buildings that have separate meters or energy-using systems.

The "Visual Guidance" section of this appendix shows a few different examples of how a garden-style property can benchmark.

## Visual Guidance: Garden-Style Examples

If you have a good understanding of how your garden-style properties need to benchmark, you can move to Step 2. If you want some visual examples, this section may be of use.

### Example 1



- Each address is a separate building, <10,000 SF
- Each address has its own gas service
- Each unit has its own electric service

Property isn't subject to MD Benchmarking or BEPS

### Example 2



- Each address is a separate building
- Each group has its own gas service
- Each unit has its own electric service

Each group benchmarks together (see yellow boxes)

### Example 3



- Each address has a separate entrance
- Each unit has its own electric service and mechanical equipment
- A basement connects each block of buildings

Each group benchmarks together (see yellow boxes)

## Example 4



- Each address is a separate building
- Each unit has its own electric service
- Each group is served by the same domestic hot water plant

Each group benchmarks together (see yellow boxes)

## Example 5



- Each address is a separate building
- One gas meter serves all buildings
- Each unit has its own electric service

The property benchmarks together (see yellow box)
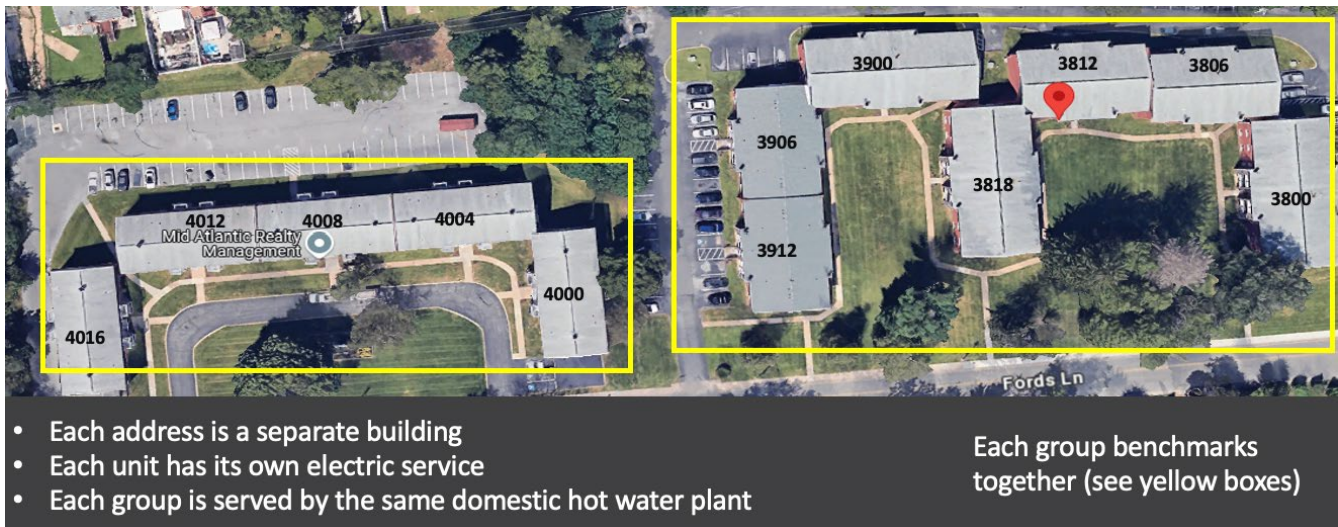
**Step 2: Figure out how big your building(s) are**

Once you complete this effort, you should be able to figure out how big each benchmarked building within your garden-style property is. If your garden-style property has more than five buildings, some separate document like a spreadsheet might be helpful to keep you organized.

Items like a site plan that clearly shows the square footage of each building (such as an ALTA survey, a site plan, or architectural drawings) can be used to then figure out the square footage of each benchmarked building.

In practice, you can use a few general rules of thumb at this stage. Right now, the goal is to figure out what you need to set up for Steps 3 and 4.

- If each building in your garden-style property can be separated following the guidelines in Step 1, it is unlikely they will be below the square footage threshold.
- If you need to join two or three garden-style building(s) together due to a common or shared system, the building may be over the square footage threshold. Steps 3 and 4 may apply for these properties but are recommended as an initial step.
- If you need to join more than three garden-style building(s) together due to a common or shared system, the building is likely over the square footage threshold. Steps 3 and 4 likely apply for these properties.

**Step 3: Set up ENERGY STAR Portfolio Manager entries for each building you need to benchmark**
You can either do this yourself or connect with a benchmarking provider to do this on your behalf. While it will be important to correctly input space characteristics like gross floor area before submitting to MDE, for now the goal of setting up ENERGY STAR Portfolio Manager entries is to begin the aggregate meter data request(s) for your properties.

**Step 4: Submit aggregate data requests (if necessary)**
If your garden-style property is connected via shared systems, meters, or common spaces (like a common area basement), you may need to submit aggregate data requests to a specific utility. It is highly recommended to get these aggregate data requests in no later than May 20th. This gives you the 90-day turnaround time allowed by the utilities along with a little bit of a grace period to review their data, make sure they provided the correct information, etc. See this document from MDE that contains information on how to request aggregate meter data from your utility.

For SMECO members: If you have a garden-style property where you combined multiple buildings together, you will need to submit one meter per building.

While waiting on aggregate data to be provided, you can complete Step 5.

**Step 5: Figure out space characteristics (Gross Floor Area, Number of Units)**
This entails two items:
1. Measure the gross floor area of each covered building, ideally using the documents identified in Step 2. If those documents are not available, you may need to make your best estimate this year using aerial images (e.g., Google Maps). If you need to do this, you should plan for your 2026 third-party verification effort to dig in more to figure out covered building gross floor area.
2. Collect the number of units and the number of bedrooms per covered building. (If necessary, use the spreadsheet in Step 2 to help you keep straight how many units and bedrooms are in each covered building).

**Step 5b: Figure out if you added any extra covered buildings in Step 3 and adjust**
Recall that after Step 2, you may have made some assumptions about gross floor area in order to get aggregate meter data requests submitted in a timely manner. However, there is a chance in some cases after completing property measurements you may have ended up with an extra "covered building" or two. If you do, you can cancel the aggregate meter data request, as the building would be under 35,000 square feet.

**Step 6: Connect the property to MDE's Portfolio Manager account, reconcile the Covered Building List**
These steps are largely covered in MDE's Benchmarking Guide but are important as they are the actual compliance steps.

## Appendix II: Best Practices for Benchmarking
**Request your data early**
Utilities are allowed to take 90 days to respond to requests in 2025. Working backwards, this means the absolute last date for utility data requests to go in is June 1st.

However, as we approach the benchmarking deadline it is possible that utility data response times will start to slip. Most utilities have not needed to comply with mandatory benchmarking requirements before, although in the case of Prince George's County properties this is only true for SMECO. (However, BGE may not be used to the quantity of requests. A few properties in Montgomery County are serviced by BGE so they have familiarity with the process.) This document recommends submitting aggregate data requests no later than May 20th.

**Coordinating with benchmarking providers**
Benchmarking providers can report on your behalf but they may need you to provide good data from the site. When entering into a contract with a benchmarking provider for your property/properties, have the discussion

up front on what their expectations are in terms of information they would need you to provide compared to information they would collect.

**Tips for collecting good space data**
Leasing documents may only show leasable square footage. Building drawings, particularly architectural drawings (if you have them), are typically a good, reliable indicator of gross floor area so long as they conform with ENERGY STAR Portfolio Manager guidelines.

For offices, BOMA calculations are a good document if you have them.

**Include ancillary items if their energy use is included**
Because of the mechanics around how BEPS, including your parking area, EV chargers, and other ancillary loads are a good idea if they are not otherwise sub-metered (in which case they can be fully excluded).

**Tips for data storage**
Third party verification happens in 2026 based on 2025 data. Your verifier will want to see the documentation you collected this year. Storing copies, particularly electronic copies, of your documentation will streamline your verification effort, reducing the time of the verifier. If you have multiple properties, organizing data by property and by data type (e.g., gross floor area, space characteristics, and meter data) is helpful.

## Appendix III: Key Links

[Find your buildings in the Maryland BEPS Portal](#)

[Maryland benchmarking guide](#)

Aggregate data requests: [MD Connecting With Your Energy Provider Document](#)

- Pepco (page 13) customers can find information on getting their Pepco data at [Pepco Energy Benchmarking](#).
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If you have any questions or concerns, please reach out to
AOBA's Director of Sustainability, Policy, and Strategy, Chris Pendley at [cpendley@aoba-metro.org](mailto:cpendley@aoba-metro.org).