

WA Clean Buildings Performance Standard (HB-1257)

Snohomish County
August 24, 2021



Washington Clean Buildings Performance Standard

The Clean Buildings Performance Standard became law in 2019.

- Objective to lower costs and pollution from fossil fuel consumption in existing large commercial buildings.

Buildings larger than 50,000 sq. ft. must meet EUI targets.

- Individual buildings – not campuses.
 - Buildings larger than 220,000 sq. ft. | **June 1, 2026**
 - Buildings larger than 90,000 sq. ft. | **June 1, 2027**
 - Buildings larger than 50,000 sq. ft. | **June 1, 2028**
- Campuses will require submetering (to determine building level EUI) or detailed energy audits to pursue alternate compliance

Early Adoption Incentive Program – Opens in 2021

- Performance-based incentive for highly inefficient buildings

12 Months of Energy Data below Target

EUI documented through ENERGY STAR Portfolio Manager

Compliance Components

Building-Specific Energy Management Plan

Building-Specific O&M Plan



Noncompliance Penalties

Commerce may impose a penalty for covered building owners that fail to comply.

- Continuing violation may not exceed daily amount equal to \$1/year/sq. ft.
- Penalty may not exceed \$5,000 plus the total continuing violation fine.

AND...noncompliant building owners must:

- Pay for and perform an energy audit.
- Pay for and execute energy efficiency measures.



Early Adoption Incentive Program

Early adoption financial incentives and technical assistance will be available if the building is:

- Has an EUI exceeding the target by 15 points or more.
- *Buildings must be able to demonstrate 12-month EUI for submetered buildings in a campus setting*

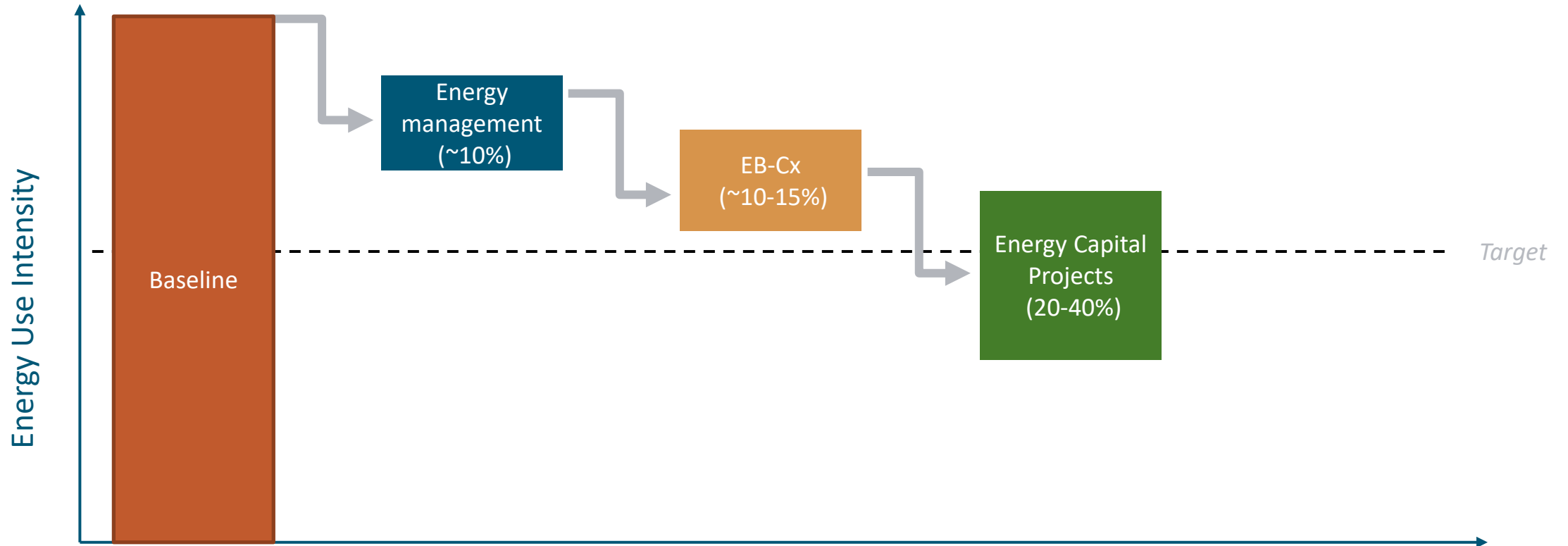
Early adoption base incentives equal \$0.85/sq. ft.

- Program incentives capped at \$75 million.
- Available on a first-come, first-served basis.
- Can be combined with other utility incentives and state/federal grants
- Building owners must complete a comprehensive energy audit and implement measures to get below EUI
- *Incentive paid only after M&V demonstrates that post-project EUI is below target*

Early Adoption program opens in 2021

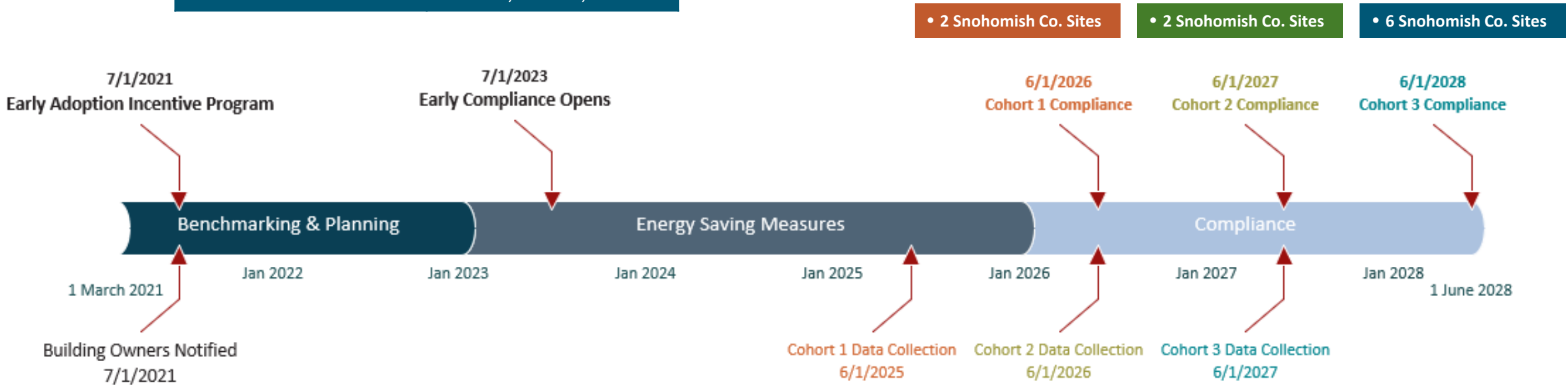
- “Intent to apply” pre-form now available
- Incentive applications “open” date on Clean Buildings Portal still TBD from Dept of Commerce (originally intended for 7/1/21)

EUI Reduction Strategies



Overall Compliance Timeline

Compliance Group	Gross Floor Area (sq. ft.)
Cohort 1	≥ 220,000
Cohort 2	90,000 – 220,000
Cohort 3	50,000 – 90,000



Snohomish County Facilities Preliminary CBPS Overview

BUILDING	GROSS SF	EUI (EST.)	COMBINED EUI	COMPLIANCE DEADLINE	POTENTIAL PENALTIES*
Wall Street Jail (Old)	115,578	99	118.0	June 1, 2026	\$563,567
Oakes Street Jail (New)	256,800	127.3			
Administration West Building	118,812	51.3	58.5** (est.)	June 1, 2026	\$447,406
Administration East Building (Robert J Drewell)	176,125	63.5			
Campus Courthouse	144,508	50.4	61.0** (est.)	June 1, 2027	\$295,423
Mission Building	49,107	92.2			
Fleet ER&R Cathcart	52,800	65.0** (est.)	-	June 1, 2028	\$84,200
Fairgrounds Indoor Arena (100 Building)	57,190	31.0** (est.)	-	June 1, 2028	\$85,785
Denney Juvenile Justice Center	121,771	89.2	N/A	June 1, 2027	\$187,657
Paine Field - Future of Flight	73,309	79.1	N/A	June 1, 2028	\$114,964
Paine Field-Hangar 2/C-1 Hangar	73,940	TBD	N/A	June 1, 2028	\$115,910
Paine Field-Hangar 207/Flying Heritage Combat Armor Museum	52,350	71.9	N/A	June 1, 2028	\$83,525
Paine Field Airport Regional Transfer Station	70,572	48.4	N/A	June 1, 2028	\$110,858

Clean Buildings Performance Standard – Buildings *without* EUIs



Requirements & Submetering

A building *without* building-level EUI data must comply via Building Investment Criteria. Two compliance strategies exist:

01

Submetering

Install submeters to get building-level EUI data = traditional compliance path

Continuous building-level energy data monitoring

Tailor compliance strategy around actual EUI

Continue to manage and monitor building energy use for compliance

02

Level 2 Energy Audit

Invest in ASHRAE Level 2 Energy Audit with life cycle analysis

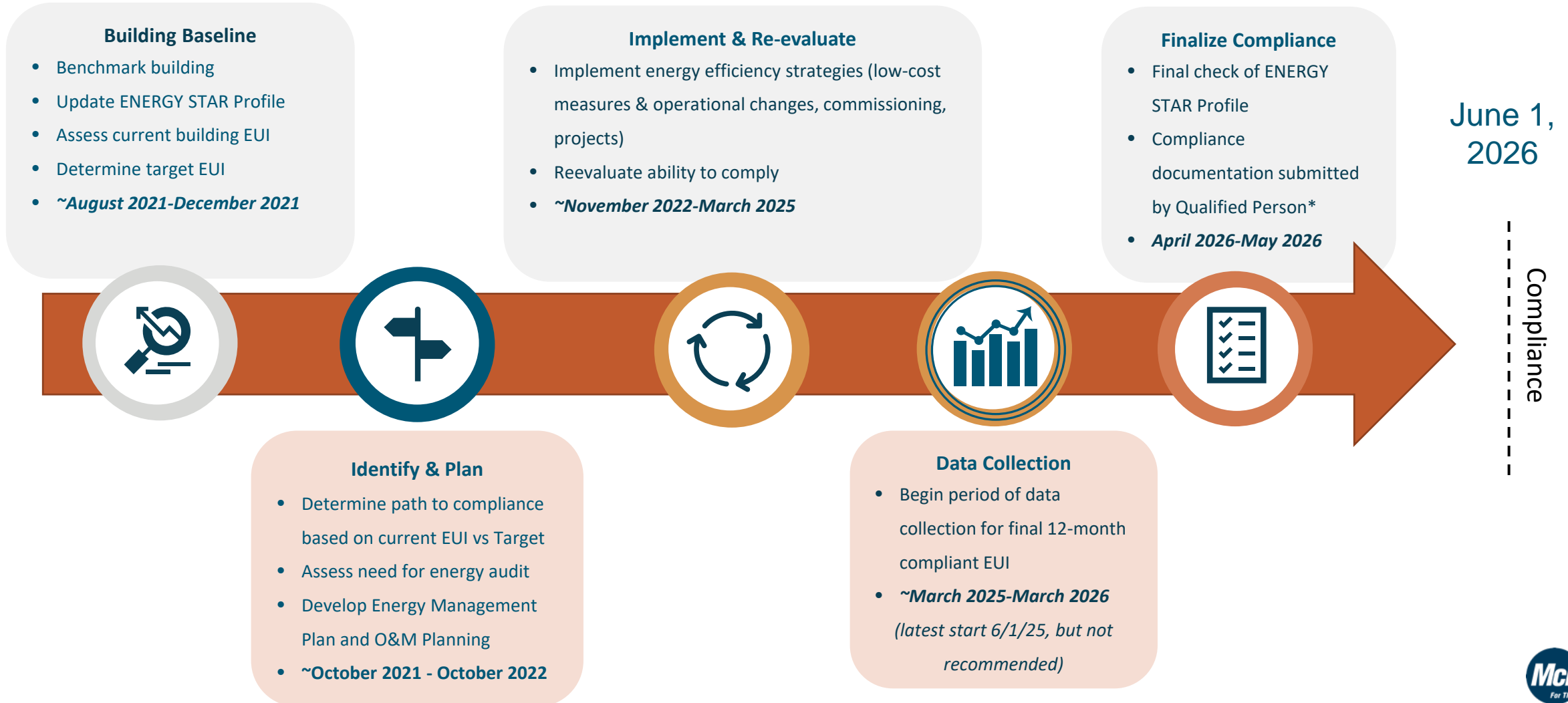
No building-level energy data

Requires all cost-effective energy measures be implemented

Need to redo energy audit every 5 years for compliance

Sample Single Building Compliance Activity Timeline

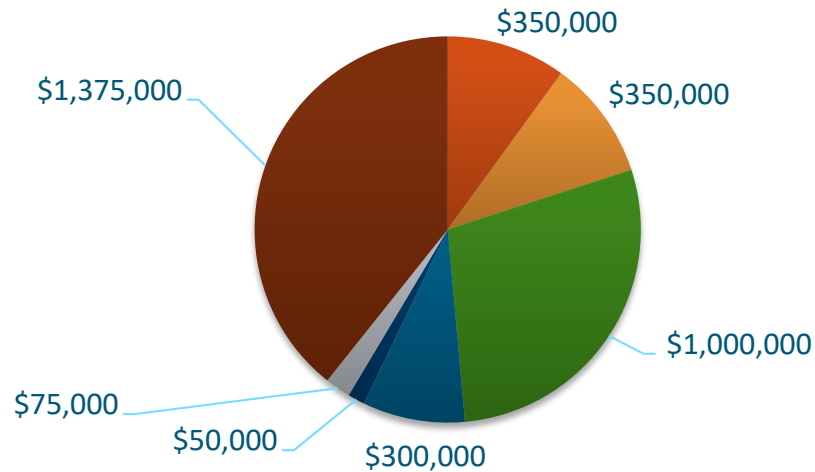
For a Cohort 1 facility (220k sq. ft.+) **with** building-level EUI data



Funding Opportunities

Think Big, Leverage Multiple Sources

Funding Sources – Sample \$3.5M Project



- Energy Grants
- Solar Grants
- Stimulus Funding (CRF/CSRF)
- Early Adopter Program
- Retro-commissioning
- Utility Rebates
- Capital Funding

Source	Need to Know
Energy Grants – Department of Commerce	<ul style="list-style-type: none"> Potentially this fall/early winter 2022 Max grant is typically \$350-\$500K Need matching fund Typically 1:1 or better IGA completed for application
Solar Grants – Department of Commerce	<ul style="list-style-type: none"> Applications due August 2021 IGA completed for application Max grant is typically \$350-\$500K
CARES Act (CRF) & American Rescue Plan (CSRF) Funding	<ul style="list-style-type: none"> Various amounts used in various ways, including facility health expenditures (IAQ) Can be used as matching funds for grant
Early Adopter Program	<ul style="list-style-type: none"> Building owners notified & portal opens 7/1/2021 Before you apply considerations
Retro-commissioning	<ul style="list-style-type: none"> Utility funding opportunity
Utility Rebates	<ul style="list-style-type: none"> For energy efficiency
Future Infrastructure Funding	<ul style="list-style-type: none"> Potential fall passage through Reconciliation Details to be determined pending passage of legislation Proposed investments to modernize commercial buildings and clean energy investments in municipal buildings

Recommendations

Short Term: 2021-2022

1. Budget for Submetering Implementation at four facilities
2. Consider Jail Facilities for Early Adopter Incentive
3. Budget for compliance documentation **and** compliance strategy development

Mid Term: 2023

4. Analyze (or update) facility asset lifecycle replacement outlook
5. Jail project costs (if pursued) and funding mix

Long Term: 2024 and Beyond

6. Allocate internal staff or ext. technical consulting to manage EUI performance & ongoing compliance
7. Budget for implementation of EUI reduction strategies