COMMUNITY AND TECHNICAL COLLEGES
Washington State Board

Energy Star Portfolio Manager Data Management

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REQUIREMENTS

There are two State laws and one City ordinance that require the Colleges to maintain building energy consumption data in Energy Star Portfolio Manager (ESPM), each with slightly different requirements. While you do NOT need to create ESPM property accounts for every building owned and leased by the College, you DO need to maintain multiple property accounts. This document clarifies what is required for your college and recommendations on best practices.

State Agency Energy Benchmarking (RCW 19.27A.190), adopted in 2009, requires state agencies to establish and maintain benchmarking for all "*reporting public facilities*". This also applies to leased buildings where the state pays the utility costs and might include all the buildings in your portfolio. (See the DEFINITIONS at the end of this document.)

The WA Clean Buildings Performance Standard (RCW 19.27A.200 and WAC 194-50) applies to all commercial buildings greater than 20,000 square feet of conditioned space as well as all buildings connected to a qualifying district energy system.

Both laws are concerned with *conditioned space,* although they refer to slightly different definitions. The Energy Benchmarking law references the definition written in the State Building Energy Code and the CBPS has its own definition of conditioned space in WAC 194-50-030. There are differences in the language, but the meanings align. The simple version is "*An area, room or space that is enclosed within the building's thermal envelope and is directly heated or cooled or is indirectly heated or cooled."* (See the DEFINITIONS.)

Seattle's Building Emissions Performance Standard (BEPS) (Code Chapter 22.925) is also triggered for any buildings greater than 20,000 gross floor area located within Seattle City Limits. The BEPS notably does not mention conditioned space. If you're in Seattle, you're already working under BEPS. Since no one else needs to worry about BEPS, this document will focus on the two State-level requirements.

The Clean Buildings Performance Standard and the building code use similar definitions of gross floor area, which also aligns with the definition in ESPM. For those of you attempting to keep everything straight, most existing building square footages were calculated according to the definition in OFM's Facilities Portfolio Management Tool (FPMT), but there are a few nuances once you begin measuring total conditioned space. OFM defines gross square feet as *the total constructed square footage of a building, the sum of all spaces on all floors of a building measured to the exterior enclosing walls*.

SETTING UP ESPM

ESPM is a free service provided by the EPA, and a large amount of training and support is available through them and WA DES. (See the REFERENCES section.) ESPM property accounts are defined by name, ID number's, location, size, use type, and resource consumption records. The Clean Buildings Performance Standard and other rules are specifically focused on energy consumption, but you can also track water and waste in ESPM if you choose.

The 2009 **State Agency Energy Benchmarking** law triggered the original ESPM set up for most Colleges, and many are still managing remnants of that original configuration which included everything that might be considered a structure or energy-consuming space on campus. That reporting requirement has since been clarified. You do NOT need to build accounts for every individual structure, parking lot, street sign, etc.

You DO, however, need a campus-level parent for any contiguous property where the sum of state-owned conditioned space is greater than 10,000 GSF (this also applies to leased property when the state pays the utility bills) to meet the Energy Benchmarking requirement. That includes all main campus and many satellite locations.

CBPS reporting could be completed for each individual affected building, in which case you'll need individual ESPM properties for all buildings larger than 20,000 GSF (CBPS-affected buildings). Those buildings, however, must have their own energy sub-meters for the ESPM property account to be useful. A building account without all applicable building-specific energy consumption data is useless for compliance and energy management purposes.

Alternatively, district energy systems, buildings on shared energy meters, and/or an entire campus may be combined within a single compliance report. In those grouped building compliance scenarios, the ESPM property must be defined at the appropriate group size.

For reference, a campus-level group includes all college-owned structures on contiguous, college-owned property. College-owned property split by public roads still qualifies as a contiguous campus if there are no other intervening land parcels under other ownership.

ESPM Parent properties often have individual buildings associated with them, but the Parent is always defined as a distinct property, i.e. "Our Best Community College Main Campus". The GFA for the property must be calculated from the sum of ALL (energy-consuming) building space on the campus, and all utility meter data should be included, as well as any on-site solar PV (absent any energy sold back to your utility). *The PV requirement may change in January 2026.*

Both state-level reporting requirements allow for campus parents as the only reportable ESPM property account. However, ESPM does not easily allow meters to feed multiple property accounts, which can complicate your property configurations in some cases. *A meter that serves multiple properties in a campus can be associated to the parent property that represents the entire campus, but a meter cannot be assigned to multiple child properties or a subset of the properties on a campus.*

District energy systems required to report a decarbonization plan may need to have a Parent property in ESPM that includes all the buildings connected to/served by that system.

Grouped Building Parents (which might be the same as your Energy Benchmarking campus parent) are required for those seeking campus-level compliance with the CBPS.

It's possible for the same campus parent property to satisfy both state reporting requirements, which allows for more efficient setup and data management on your side. There is no fundamental requirement to maintain ESPM building property accounts for individual facilities included within a campus parent that are smaller than 20,000 GSF and don't have individual sub-meters, although you will need to include the gross square footage in your total campus GFA. It's worth cleaning out unnecessary properties but confirm that Commerce understands the scope and scale of your campus group before removing properties. (See the separate guidance ESPM-DeletingProperties.docx.)

There are differing conditional requirements within the Clean Buildings Performance Standard for which buildings must have active Energy Management programs, and you might want to maintain individual building accounts to honor your EM goals, but the ESPM tool will not be useful if you don't have building-level energy sub-meters for each property. In those cases, you may be better off using a different set of tools for energy management.

A property account for buildings greater than 20,000 square feet of conditioned space does NOT need a Parent for Clean Buildings reporting if you intend to report it as a single building.

Parent properties are relatively flexible. But all property details in the Parent must be configured as if it were a single property. The ESPM Parent will NOT automatically calculate and total the GFA nor will it calculate sums of the energy meter data of all buildings attached to the parent.

The buildings within a Parent group – campus, district energy, or otherwise – may be linked to the parent. An individual building can be linked to multiple parents. You do not need to recreate building properties within each parent. Simply link your existing buildings to the appropriate Parent property(s).

Also note that every change in the gross floor area (GFA), at either the building or parent level, will reset the EUI calculations. ***It's important to get those details clarified and done early, since you'll need 12 months of solid data to meet reporting requirements.***

Building and Parent property descriptions include multiple details, some of which are not covered here. The following essentials will be sufficient to meet the existing requirements:

- **Name** (Building or Campus) – please use your publicly defined building name (i.e. Center of Everywhere), or a uniform "Campus name BLDG #/Letter" naming convention.
    - *Many campuses use both building names and short-cut numbers or letters*

internally, use the publicly visible names. Use a naming convention that will make sense to contractors, SBCTC, or Commerce staff!

- **Street address** – please use physical street addresses, not mailing addresses.
- **Gross Square Foot/Gross Floor Area** – measured from the exterior of the building thermal envelope (see DEFINITIONS and HERE). This information should be in the construction contract documents. GFA should generally be consistent with the listing in OFM's FPMT, which serves as the CTC system's official facilities inventory, though there may be exceptions. Campus Parent GFA must include the total GFA for all structures on the campus unless a structure is not enclosed or does not include any heating or lighting, such as small storage sheds.
- **Property Use Type** – this should be "College/University" for most of our buildings. College/University refers to buildings used for the purpose of higher education, public and private. Gross Floor Area should include all space within the building, including classrooms, libraries, laboratory classrooms, offices, cafeterias, maintenance facilities, arts facilities, athletic facilities, residential areas, storage rooms, restrooms, elevator shafts, and stairways.
    - Property Use Type is assigned in two places, at the whole building level and as internal space allocations. Some campuses have further defined internal space types. This practice is NOT required and will complicate your data management. "College/University" includes all our common space uses. Set it as the single Property Use Type within the building and ensure that it totals to the GFA listed for the building (disparate GFA values is a common error). That will simplify the property details and data management. There are few special exceptions to this practice but reach out if you think you have one.
    - *Dormitories fall within the College/University property use type. However, a residential home modified to provide student housing may be realistically classified within the Lodging/Residential use types, if it's necessary to include that building in your campus parent property.*
    - *Please check with the Clean Buildings team at Commerce if you feel you have a CBSM affected building that should be a different Use Type.*
- **Standard ID** – This will be used for the WA UFI and Commerce ID. You may need to set both.
    - Under "Standard ID – Other:" select "State of Washington Unique Facilities Identifier (UFI)" and enter the building's UFI.
    - Under "Standard ID – State/Province:" select "State of Washington Clean Buildings Standard" and enter the Commerce Building ID (when applicable).
- **Energy Meters** – define the energy meters for your building. Meter entries include energy type, utility provider, meter name, and activation date. See HERE for ESPM guidance on meters. You may find that your utility or ESCO can make this process very easy for you.
- **Parent names** – Name the Campus, District Energy System, or relevant connected building group to facilitate data management.
    - *IF* you have registered a district energy system with Commerce, or plan to file for campus-level compliance, you will need to set up that system in ESPM as a Parent Property. Use the name you provided in your Decarbonization Plan registration or your physical campus name, then attach all the buildings on the

system as properties under that parent. Commerce has developed guidance for this process HERE. See the ESPM guidance HERE.

Sharing: all properties should be shared as appropriate for the property, and each shared access account may be set for different levels of access. See HERE for the ESPM guide to sharing.

The SBCTC and DES should both receive sharing permission on all properties; Read Only access will suffice. Those individuals are:

- Scott Morgan at SBCTC, in the system as WASTATEPUBLICCOLLEGES
- Sharon Nyberg at DES, in the system as WASTATEGENERALADMINISTRATION

You may also need or choose to share the property with your Utility and/or ESCO service provider for energy data upload purposes, and with the Clean Buildings team at the Dept of Commerce, in the system as WACLEANBUILDINGS. Buildings within the City of Seattle will also need to be shared with the city.

Utility Data: if your building is served by single utility meters, then your utility provider(s) are required to provide energy consumption data to building owners upon request. Talk to them. Larger utilities will offer an automated upload option, usually as an interconnection with their dashboard. Smaller utilities might only be able to provide the data to building owners in an Excel document, see RCW 19.27A.170. Also see EPA's list of utility connections.

That Excel document may be generated automatically through ESPM once all your properties are configured. (This option may also be accessed through the Energy tab for individual properties.)

- Log in
- Look for the "Manage Portfolio" box in the lower left screen
- Click on "Upload and/or update multiple properties"
- That will take you to a page that provides multiple options for bulk upload templates.
- Select "Create an Upload Template", on the right side of the page.
- Then select "Add Bills to Existing Meters"
- Select the relevant properties, and then
- "Create and Download Template".

If you're relying upon owner-installed sub-meters, then the spreadsheet may be your best option for manual data uploads. Track and double-check your energy data in the spreadsheet, then schedule regular bulk uploads into ESPM. This process can also help minimize the data quality concerns mentioned in the following section.

If you are currently working on installing submeters, or upgrading an older system, it is worth asking your vendor/contractor to scope equipment and a software dashboard that will connect with ESPM and automatically upload monthly/regular consumption data. It might be available.

DATA QUALITY CONTROL

DES prepared a report in 2020 (see link in the REFERENCES) on the state energy

benchmarking process that highlights several data management concerns worth repeating. These are particularly concerning for Tier 1 affected buildings which must be able to document annual EUI calculations in ESPM.

ESPM cannot provide an annual benchmarking report if there are gaps or overlaps in the data (energy consumption over time), and it's relatively easy for those data corruption moments to happen. Utilities change out meters, make billing adjustments, and/or change data dashboards regularly. You may also see impacts from meter failures, staffing changes that disrupt data collection and/or uploads, and/or changes to billing cycles. Any such event could cause automatic data uploads to become corrupted or completely disrupted.

Do not assume that an automatic data upload connection with your utility or meter management platform will be 100% reliable during your reporting periods. It is important that someone is checking all college ESPM accounts at regular intervals to catch and clarify any data quality failures.

ESPM provides alerts (small red exclamation points) within the platform and a Data Quality Checker function that can be run to check 12 months of energy data for any errors (see the link about halfway down the Summary page for a property). It is also possible to create a similar Data Quality report (Reporting tab, Energy Star Reports, more info HERE) that could be run regularly.

All of these built-in functions, however, require regular attention from a representative of the college. Ideally, that staff person or team should also be tracking utility energy consumption or be in close contact with those paying monthly utility bills, so they are able to notice missed billing periods, bill adjustments, and meter changes. They should still, however, set a regular schedule to log into ESPM and confirm that no data discrepancies have occurred.

DEFINITIONS

Reporting public facility *means any of the following: a building or structure, or a group of buildings or structures at a single site, owned by a qualifying public agency, that exceed ten thousand square feet of conditioned space"* and *"Buildings, structures, or spaces leased by a qualifying public agency that exceeds ten thousand square feet of conditioned space, where the qualifying public agency purchases energy directly from the investor-owned or consumer-owned utility.* (Energy Benchmarking law, defined in RCW 19.27A.140, #22)

Gross floor area *means the total number of square feet measured between the exterior surfaces of the enclosing fixed walls of a building, including all supporting functions such as offices, lobbies, restrooms, equipment storage areas, mechanical rooms, break rooms, and elevator shafts. Gross floor area does not include outside bays or docks.* (CBPS, RCW 19.27A.200, #17)
Complex**:** *A group of buildings interconnected by conditioned spaces on contiguous property.* (CBPS, WAC 194-50-030)

Conditioned space**:** *An area, room or space that is enclosed within the building's thermal envelope and is directly heated or cooled or is indirectly heated or cooled. Spaces are indirectly heated or cooled where they communicate through openings with conditioned spaces, where they*

are separated from conditioned spaces by uninsulated walls, floors or ceilings, or where they contain uninsulated ducts, piping or other sources of heating or cooling. (also see, semi-heated space). (CBPS, WAC 194-50-030)

***Conditioned Space**. An area, room or space that is enclosed within the building thermal envelope and that is directly heated or cooled or that is indirectly heated or cooled. Spaces are indirectly heated or cooled where they communicate through openings with conditioned spaces, where they are separated from conditioned spaces by uninsulated walls, floors or ceilings, or where they contain uninsulated ducts, piping or other sources of heating or cooling. Elevator shafts, stair enclosures, enclosed corridors connecting conditioned spaces, and enclosed spaces through which conditioned air is intentionally transferred at a rate exceeding three air changes per hour are considered conditioned spaces for the purposes of the building thermal envelope requirements.* (Energy Benchmarking law, WA State Building Energy Code, Section C202)

***State campus district energy system**: A district energy system that provides heating, cooling, or heating and cooling to a campus through a distributed system providing steam, hot water, or cool water to five or more buildings with more than 100,000 square feet of combined conditioned space, where the system and all buildings connected to the system are owned by:*

(a) The state of Washington; or

(b) A public-private partnership including one public buildings owner and one private entity. (CBPS, Proposed rules, HB 1390)

REFERENCES

Please use the following to find more detailed information and training, and feel free to reach out to Scott at the SBCTC if you need assistance: semorgan@sbctc.edu, 360.704.1073

- Benchmark Buildings in Energy Star Portfolio Manager
- ESPM Training Resources
- ESPM Searchable How-to
- ESPM Log in
- DES ESPM Benchmarking program
- DES 2020 Benchmarking Report
- OFM Facilities Inventory Resources
    - *Look for CTC Instructions and Data Requirements midway down the page.*
- Basics of using ESPM to comply with energy benchmarking ordinances.

- Process to transfer Property Data Ownership from a person who's left the college.
- Best Practice for Organizational-level Property Administration.
- Maintaining a 'corporate' account.
- Transfer building ownership in ESPM.
- How to benchmark a campus.
- Parent (campus) properties may not be nested.
    - Child (building) properties can be attached to multiple campus parents, however.
- Each ESPM property must be shared with other users individually.
- Child property details are not collected into the campus parent property.
- Campus properties only use the meter data directly connected to that property, not anything from the attached building properties.
- Child property metrics are not automatically calculated into the Parent property metrics.