



Written Testimony of Andrew Burr
Director, Building Energy Rating Program
Institute for Market Transformation

National Institute of Building Sciences
Representative Hearing on Data Needs to Achieve High-Performance Buildings
Aug. 2, 2011

Mr. Holness, Mr. Skaggs and Mr. Green:

Thank you for the opportunity to submit written comments on commercial building data needs to achieve high-performance buildings. The Institute for Market Transformation (IMT) is a Washington, DC-based nonprofit organization promoting energy efficiency in buildings.

IMT supports increased funding for the U.S. Energy Information Administration's Commercial Buildings Energy Consumption Survey (CBECS), the nation's largest building energy consumption dataset and the foundation for the U.S. Environmental Protection Agency's Energy Star benchmarking program and energy and atmosphere credits in the U.S. Green Building Council's LEED for Existing Buildings green building rating system. IMT also supports the data needs related to Energy Star benchmarking identified by Michael Zatz of EPA in testimony to this committee.

IMT is providing technical assistance to policymakers in states and cities to implement building energy benchmarking and disclosure policies that require the use of EPA's Energy Star benchmarking program, and we are working with many other local jurisdictions that are exploring this type of policy. According to IMT research, the policies that are already enacted could impact more than 4 billion square feet of floor space in more than 60,000 buildings.

IMT believes a primary objective of any national energy data collection effort supplementing CBECS should be to enable the Energy Star benchmarking program to continue providing accurate, reliable and robust building energy performance metrics and comparisons. This issue is of great interest to the jurisdictions that are implementing benchmarking policies, as well as the building owners and managers that conduct voluntary benchmarking. Updated energy data beyond the 2003 CBECS dataset will make these policies, and benchmarking in general, more representative of the current building stock and more relevant for stakeholders and consumers. Updated energy data will demonstrate recent energy efficiency gains in the building stock and thus raise the bar for buildings as they compare their energy performance against the performance of other buildings, encouraging greater reductions in energy consumption.

One of the greatest needs we hear from local jurisdictions and local building owners related to benchmarking policies is the ability to compare the energy performance of buildings against similar buildings at a local or regional level. Energy Star's benchmarking tool makes national comparisons between buildings (normalizing for climate and other factors) but cannot compare buildings by geographic region due to statistical data limitations in CBECS. There is tremendous value in national comparisons, but there is also value in local or regional comparisons that can more accurately account for local trends in building performance, operations and physical characteristics (such as building size and

age), and thus encourage direct energy efficiency competition in individual markets. We recommend that any new or updated dataset be statistically significant at a regional or local level.

Benchmarking policies may also provide an opportunity for data gathering. Energy performance metrics for billions of square feet of floor space must be reported to jurisdictions in the coming years. In many cases, that information will include annualized energy consumption, energy use intensity, building square footage and building type. We encourage NIBS to engage with these jurisdictions about how these very rich datasets can be leveraged.

IMT appreciates the opportunity to submit written comments on commercial building data needs to achieve high-performance buildings, and wishes to thank NIBS for its leadership on this issue. For further information, please contact Andrew Burr at IMT (202-525-2883 or andrew@imt.org).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'AB', is centered below the text 'Respectfully submitted,'.

Andrew Burr
Institute for Market Transformation