

Decarbonize Existing Buildings - April 5 Roundtable

Q&A Session on BERDO & BEUDO with Hannah Payne and Seth Federspiel

- **How many property owners submitted BERDO data for the year 2021? Were there any delays and challenges with 3rd party verification?**
 - a. **Hannah**
 - i. 63% of buildings submitted for calendar year 2021.
 - ii. Important to remember that there were thousands of properties reporting under BERDO for the first time/first year.
 - iii. 3rd party verification is going well - we're seeing better data quality.
 - iv. The demand for verifiers was significant.
 - b. **Seth**
 - i. Significant uptick in reporting over past year, good compliance early on.
 - ii. Compliance rate gradually declined during pandemic but is back up. The City has more staff to identify non complying properties.
 - iii. Cambridge does not currently require third-party verification but is expecting to implement that requirement in the future.

- **Are there fines for not submitting or late submissions? How forgiving is the city on fines?**
 - a. **Hannah**
 - i. Priority has been getting people into compliance with complete reporting.
 - ii. The City's ability to enforce and issue fines is something that will be put into fuller practice in the future.

- **Do you have a sense of how many folks are submitting on their own vs third party companies?**
 - a. **Hannah**
 - i. Larger property owners are often hiring a firm to do reporting with separate individuals to do third party verification.
 - ii. Smaller properties are often doing reporting themselves.
 - iii. Wide range of expertise that the City is helping through the reporting process.

- **Any tools to help with the reporting process?**
 - a. **Seth**
 - i. In addition to City staff, Cambridge has a reporting help desk (accessed through the BEUDO website).
 - ii. A new reporting platform via Portfolio Manager, allows property owners to directly connect PM to the reporting portal and allows for data transfer to make easier and reduce errors, updates in real time.

b. Hannah

- i. Boston specifies two reporting tools - Portfolio Manager to submit energy data and the BERDO reporting form to collect additional data i.e. contact info, optional questions, detailed questions on EV, renewables, backup generation.
- ii. The platform for accessing the BERDO reporting form has changed and the form has been revised. The City updated their How-to Guide. It's detailed and quite helpful. I strongly suggest people use that as a reference. All resources are available at boston.gov/berdo.

● **For BERDO, is it possible for building owners to do their own verification? What is the process for becoming a verifier?**

a. Hannah

- i. Building owners cannot verify their own data. Nor can it be the same person that did the reporting even if reporting process is outsourced
- ii. Verifiers must have an active credential from the approved list: [BERDO Policies and Procedures](#)
- iii. On-line instructions and process. Applicants must submit proof of credentials. [Third-party verification Guide](#).

● **For BERDO, can you clarify the tenant as owner ?**

a. Hannah

- i. A tenant can be designated as owner for all BERDO compliance if there is at least a thirty year lease in place and both the tenant and owner submit a signed letter agreeing to designate the tenant as the "owner" for the purposes of BERDO compliance.

● **Can you speak to ways to comply with BERDO through renewable energy purchases?**

a. Hannah

- i. A complex topic. Please refer to the adopted regulations: [BERDO Policies and Procedures](#)
- ii. The main options are as follows:
 1. Participate in Boston's Community Choice Electricity program and opt up to 100% renewable option. (Boston.gov/bcce)
 2. Purchase and retire unbundled non-emitting MA class 1 RECs
 3. Enter into a power purchase agreement to purchase electricity and bundled RECs. The contract needs to be signed before operation of renewable generation. Must be a new project where PPA is directly resulting in new power generation. These projects may be anywhere in the US or Canada but must be connected to a regulated grid.

4. Solar:

- a. If solar is located in Eversource's Eastern Massachusetts territory RECs do not need to be retained only if the system is operational prior to 2024 and the Owner or tenant(s) of a covered Building begin to acquire electricity or generation credits from the solar generation system prior to 2024.
- b. If solar is in the City of Boston, the RECs do not need to be retained and there is no timing requirement.

b. Seth

- i. Cambridge will be allowing RECs from outside New England. Specific rules are being developed.
- ii. Cambridge doesn't accept class I RECs of Massachusetts as they are not adding any new renewables.

● **Will the City provide consideration on meeting emissions limits to owners during the interim period when a new renewable project is under construction or in the pipeline?**

a. Seth

- i. Considering how to do this in policy design, potentially allowing more flexibility for unbundled RECs during the interim, TBD

b. Hannah

- i. No flexibility built in for PPAs, during interim period, owners would need to buy unbundled RECs
- ii. Owners can request leniency if there is an interconnection request is delayed for a local renewable energy project (i.e. solar in Boston).

● **Any indication on when Cambridge's net zero date is aiming for?**

a. Seth

- i. Under discussion
- ii. Good chance that it'll be different for building sizes
 1. Larger buildings: likely to be 2035
 2. Smaller buildings and residential: closer to 2050
- iii. Latest IPCC report is targeting 2040 for net zero so dates may be pushed up

● **How do you define emission factors?**

a. SETH

Under Discussion

b. Hannah

- i. For grid electricity, Boston will develop an annual emissions factor based on ISO NE data. If it is lower than projected grid emissions factors (reported in Policies), then it will be used for compliance. If it is higher than projected grid emissions factors, then the projected emissions factor

will be used for compliance.

- **Please clarify the resources that the Cities of Boston and Cambridge presently offer? Any that the City is considering adding?**
 - a. [Boston's Retrofit Resource Hub](#) - We are developing additional resources and programming to support building owners.
 - b. Boston - Mayor's Office of Housing Green Energy Retrofits funding opportunity for affordable housing ([RFP](#)).
 - c. Cambridge: TBD
- **Tenant occupancy - how does one get confirmation from Tenants that they are buying green energy and if so, how much? Apartments and Condominiums that are individually metered. Can owners mandate they buy renewable energy?**
 - a. Boston - If tenants are on BCCE, the City can apply the renewable energy purchased through that program to the building. If tenants are on a competitive supply or purchasing renewable energy independently, they would need to report it separately to BERDO for it to be counted.
 - b. Cambridge: TBD
- **EV charging – included in building load? will additional rules be promulgated?**
 - Boston - Electricity for EV charging can be excluded from emissions compliance.
 - Cambridge - TBD