

STAKEHOLDER ENGAGEMENT GUIDE

CALIFORNIA ASSEMBLY BILL 802: DATA ACCESS AND BENCHMARKING POLICY

Jayson Antonoff and Leonard Kolstad
Institute for Market Transformation

June 2017



 **Pacific Coast**
COLLABORATIVE

THIS PAGE INTENTIONALLY LEFT BLANK

Table of Contents

Introduction	4
Pre-Regulation Stakeholder Engagement.....	4
Purpose	4
Disclosable Buildings List.....	5
Messaging.....	6
Key Stakeholder Groups.....	7
Recruit Key Partners.....	18
Methods of Engagement.....	22
Recommendations	24
Post-Rulemaking, Pre-Reporting Stakeholder Engagement ...	28
Purpose	28
In-depth Trainings.....	29
Resources	31
Early-Bird Reporting Recognition Program	31
Post-Rulemaking, Post-Reporting Stakeholder Engagement..	32
Purpose	32
Key Activities	32
Compliance	32
Enforcement.....	33
Data Quality.....	33
Conclusion.....	33
Acknowledgements	35
About the Institute for Market Transformation (IMT)	35
About the Pacific Coast Collaborative (PCC).....	35
Disclaimer	35

THIS PAGE INTENTIONALLY LEFT BLANK

Introduction

A rulemaking process is underway at the California Energy Commission (CEC) to create regulations implementing the benchmarking and mandatory disclosure provisions of California's Assembly Bill 802 (Williams, chapter 590, Statutes of 2015). The proposed regulations would require the owners of large commercial buildings to report building energy performance information to the CEC beginning in June 2018 and annually thereafter, and the owners of large residential buildings to report beginning in June 2019 and annually thereafter.

Prior to and for several years following the regulations going into effect, it is critical that affected stakeholders are informed about the goals of the law, and how to comply with the requirements. Engaging stakeholders early will help improve their understanding of the law and reduce confusion and concerns as compliance deadlines approach, resulting in greater acceptance of benchmarking. The regulations will affect a variety of stakeholder groups, including but not limited to building owners and managers, energy service providers, utilities, and tenants. Each group has an important and distinct role to play in the energy benchmarking process, and is therefore deserving of some level of attention in the outreach campaign.

This document serves to guide the CEC through the process of stakeholder engagement with a focus on what the Energy Commission should do throughout 2017, prior to the point when the regulations are finalized and approved, to prepare the relevant parties for compliance with the law. Since stakeholder engagement is an ongoing process that should continue well beyond that point, this plan also includes a brief description of some of the higher-level activities that the CEC should plan for after the regulations are finalized, as well as after the initial benchmarking reporting cycle. While the CEC may have some internal capacity to actively lead stakeholder engagement, this plan provides recommendations on key partners and contractors who can provide assistance in augmenting the efforts of CEC staff.

Pre-Regulation Stakeholder Engagement

Purpose

Adoption of the final regulations will occur at an Energy Commission business meeting, likely in the fourth quarter of 2017, followed by

approval from the Office of Administrative Law. The regulations would take effect in late 2017 or early 2018. Detailed stakeholder trainings cannot be delivered until the regulations have been adopted, as important details may change. Until then, the CEC and its partners should take full advantage of this “pre-regulation” window to raise awareness about the purpose of the law and the resources that will be made available to assist stakeholders. This is also the time for the CEC to develop relationships with stakeholders, so that when the regulations are approved trainings and a more targeted outreach campaign can quickly ramp up. The following sections describe the key stakeholder groups to inform about the law during this pre-regulation period (starting in the third quarter of 2017), appropriate messaging tailored to the specific stakeholder groups, potential partners to assist CEC with stakeholder engagement, and effective mechanisms for communicating the law’s requirements.

Disclosable Buildings List

Before stakeholders can be engaged, the CEC must identify the companies and individuals who need to know about the upcoming requirements. As the regulations will apply to most commercial and residential buildings with over 50,000 square feet in gross floor area, we recommend that the CEC develop a comprehensive covered buildings database for this subset of buildings. This database will enable the CEC and partners to identify the companies and individuals to engage, as well as the primary locations within the state to focus stakeholder outreach. While in-depth recommendations for creating a covered buildings database are beyond the scope of this plan, the CEC can use the following steps to guide its process.

1. Identify any internal data the CEC maintains describing California’s building stock, with a specific focus on information related to building size, type, location, and building contact information.
2. Engage relevant state and local government agencies to determine what building stock information they possess and are willing and able to share. At the state level, the California Department of Consumer Affairs Bureau of Real Estate (CalBRE) and the California Department of General Services (DGS) may be valuable allies. Since larger cities contain greater numbers of covered buildings, outreach to local jurisdictions should generally be prioritized based on city size. Although naming conventions will vary, city and county departments that provide real estate services should be engaged. This includes local tax collection agencies, which are likely to have pertinent building

stock information, as well as building departments and energy and environmental services departments.

3. Berkeley, San Francisco, and Los Angeles already have benchmarking laws in place, so we recommend that the CEC work with these cities to ensure that buildings benchmarked to meet local requirements are recognized as compliant with AB 802 regulations, and that processes are in place to allow data to be easily shared between the cities and the state.
4. Property databases created by CoStar and others are also helpful in developing a covered buildings list. CoStar databases provide information on the “gross building area” of individual buildings, which can be compared to the regulatory building size requirement. Once buildings have been filtered by size, the following CoStar fields contain useful information for stakeholder engagement:
 - Building Address
 - Owner Name and Phone Number
 - Property Manager Name and Phone Number
5. After the CEC has developed an initial listing of buildings, it should begin to reach out to any large non-profits or professional organizations in the state that may be willing to share their address lists, and cross reference these entries with the disclosable buildings list. For example, the California Housing Partnership Corporation may be able to share data on the state’s affordable housing stock with the CEC.
6. Once the CEC has compiled sufficient building stock data, a geographic information system (GIS) based analysis can be performed to determine locations of large building clusters subject to the benchmarking requirements. This can help determine where in-person events should be prioritized as part of the engagement strategy.
7. The stakeholder engagement process is ultimately about reaching people, not buildings. Therefore, the initial disclosable buildings list will need to be iteratively refined over time, to capture contact information for each of the relevant parties associated with every disclosable building. This contact list may include the building owner, owner’s agent, property manager, building engineer, sustainability manager, key tenants, or others.

Messaging

There are many important stakeholder groups that should be informed about the upcoming benchmarking requirements, and

every group will have a different underlying motivation. While the CEC and its partners should generally strive to keep the information about the regulations as consistent as possible, the CEC should also consider when to tailor the messaging and key talking points, based on the specific group being engaged. This is most important at the earliest stages of stakeholder engagement, when the CEC is attempting to help different groups understand “why is this important to me?”

In the later stages of outreach, after initial relationships have been established, the CEC should limit differentiation in its messaging. At that point consistency will become more important than having targeted messaging; this will reduce the potential for market confusion, and will eliminate the extra effort that would otherwise be required to customize specific materials for each user group.

Key Stakeholder Groups

At a minimum, a disclosable buildings database should provide contact information about building owners and property managers. Though these are the primary stakeholder groups that need to know about the regulations, there are additional parties that will also play an important role in the benchmarking process and should be included. In addition, it is often more effective to identify the trusted resources (for example, property managers, attorneys, and real estate agents) that different groups turn to for guidance, and have these parties share information about the regulations rather than having the CEC engage directly with individual stakeholders. These trusted parties must feel confident that they have the correct information to pass along to their clients, so it is important that the CEC be accessible and open to feedback from them. The below descriptions of key stakeholder groups, roughly ordered according to priority for engagement, provide information on the groups’ respective roles in the benchmarking process, what information they need to know, and representative key organizations within each sector.

Building Owners

Who are they? The owners of buildings for which reporting to the Energy Commission will be required.

Why should they be involved? Building owners will ultimately be responsible for complying with the regulations. The information provided through energy benchmarking will enable them to understand the relative performance of their buildings, and can help them identify opportunities for improvement.

What do they need to know? The purpose of energy benchmarking, compliance requirements, resources that will be made available to them, and how they can use the data.

Building owners with largest California presence:

The following list includes the 15 largest property owners in California, ranked by the total area of their holdings within the state of 50,000 sq. ft. or greater¹:

1. Irvine Companies
2. Blackstone Group
3. Douglas Emmett
4. Jamison Services
5. J.P. Morgan
6. Kilroy Realty
7. Brookfield
8. Hudson Pacific Properties
9. Boston Properties
10. Kaiser Permanente
11. Prudential
12. Sunset Development
13. KBS
14. State of California
15. Hines

In addition to any outreach through intermediaries such as professional organizations, the CEC should consider it a high priority to reach out to each of these top organizations individually. However, because this ranking is based on the **total area** of buildings, it is inherently biased toward owners of larger buildings. It could be a useful exercise for the CEC to develop a similar list based on the **total number** of buildings that will be subject to the reporting requirements, to determine if there are any organizations with large portfolios of smaller buildings.

Discussion: Regardless of whether building owners benchmark buildings themselves or rely on their property manager or an energy services firm, they should be informed of the law's intent—measuring building energy consumption facilitates managing that consumption—as they often make the final decision on whether or not to invest in energy efficiency. In addition, building owners must understand the law's requirements, as they are responsible for paying fines if they fail to comply. Building owner information

¹ Source: CoStar data, 2016.

should be relatively easy to obtain as the disclosable buildings list is developed. Although all building owners subject to the requirements of the regulations should ultimately be made aware of the law, either directly or indirectly, CEC should make a special effort to identify and directly contact the top 15 to 20 property owners in the state, based on size of holdings. As leaders in this market, their attitude toward the policy will be a bellwether for how the California real estate community as a whole may respond.

Benchmarking data indicating a building is relatively inefficient can incentivize owners to pursue energy upgrades to better position their asset in the market. Even if benchmarking data indicates a building's performance is exceeding the market average, owners may still want to implement energy conservation measures to maintain their market advantage. The CEC and partners should focus on how benchmarking will help owners identify whether their buildings are underperforming or outperforming the market—information they will want to know so they can position their properties for future success. Benchmarking can also help owners achieve company-wide energy and greenhouse gas (GHG) reduction targets, another important message to convey.

Since research has shown that benchmarking encourages owners to make their buildings more energy-efficient, it can indirectly improve owners' financial position. Not only do energy improvements reduce owners' energy bills, they can also make the building more attractive to prospective tenants and residents. Studies have shown that energy efficiency can improve an owner's bottom line through increased occupancy and rental income, in addition to lowering operating expenses. The business benefit of benchmarking is a critical message for building owners.

Property Managers

Who are they? Companies hired to manage building operations on behalf of the owner.

Why should they be involved? Building owners frequently assign responsibility for compliance with benchmarking requirements to a property management firm.

What do they need to know? The purpose of energy benchmarking, compliance requirements, resources that will be made available to them, and how they can use the data.

Property managers with largest California presence:

The following list includes the 15 largest property managers in California, ranked by the total area of their holdings within the state of 50,000 sq. ft. or greater²:

1. CBRE
2. Irvine Company
3. JLL
4. Cushman & Wakefield
5. Blackstone Group
6. Hines Securities
7. Jamison Services
8. Douglas Emmett
9. Kilroy Realty
10. Transwestern
11. Lincoln Property Company
12. Sunset Development Co
13. Colliers
14. LBA Realty
15. SteelWave

As noted above for building owners, the CEC should consider it to be a high priority to individually reach out to each of these property management firms, and may want to develop a similar list based on the total **number** of buildings that will be subject to the reporting requirements. Again, CoStar can help identify the firms with the largest number of buildings and amount of square footage under management to engage first.

Discussion: Experience with benchmarking laws has shown that most real estate investment trusts (REITs) and large portfolio owners will rely completely on their property managers to perform benchmarking activities, so it is important for property managers to be knowledgeable about the regulations. Property managers often serve as the messengers to make their owner-clients, brokers, and on-site managers aware of new regulations. As such, the regulations provide an opportunity for property managers to expand their business by offering benchmarking services to their owner-clients. Property managers would benefit from receiving “train the trainer” resources, such as frequently asked questions (FAQs) and slide decks detailing benchmarking compliance timelines and reporting

² Source: CoStar data 2016.

requirements, as these would allow them to accurately respond to their clients' questions about the law.

Just as it is for owners, energy benchmarking is a way for property managers to assess the energy performance of the buildings they oversee. Benchmarking data indicating a building is relatively inefficient can incentivize managers to pursue energy upgrades to better position their assets in the market. If benchmarking data indicates that a building's performance is exceeding the market average, managers may still want to implement energy conservation measures to maintain their market advantage. The CEC and partners should focus on how benchmarking will help property managers identify whether their buildings are underperforming or outperforming the market, which is information they will want to know so they can position their buildings for future success and demonstrate value to their owner-clients. Benchmarking can also help property managers achieve company-wide energy and GHG reduction targets.

Energy Service Providers

Who are they? Third parties that provide a range of energy efficiency services, including benchmarking, energy management software, energy auditing, and retrocommissioning.

Why should they be involved? Energy service providers are often hired by owners and managers to monitor and reduce the energy use of a building, and their services may include benchmarking. Sophisticated markets are likely to have large cohorts of energy service providers that will play an active role in the benchmarking process. Because they have a vested business interest in providing the services required by the regulations, as well as delivering potential follow-on services, energy service providers may be highly motivated to inform building owners about these requirements.

What do they need to know? The purpose of energy benchmarking, compliance requirements, resources that will be made available to them through the CEC and its partners, and how they can use the data. Because energy service providers will want to promote their own services and expertise as a way to help building owners comply with the requirements, it is important that they be well trained in the details of the law and the support services available, so they can accurately represent the program's requirements and benefits to building owners.

Energy Service Providers with large California presence: Verdani Partners, Ecova, Partner Energy, Abraxas Energy Consulting, Measurabl, Bright Power, Goby, EnerNOC, Aquicore, WegoWise.³

Discussion: These regulations will provide an opportunity for energy service providers to expand their business. Therefore, outreach to energy service providers should focus on the specifics of what is required for compliance with the regulations, so they can demonstrate in-depth knowledge of the requirements when speaking to potential clients. Unfortunately, most service providers in California do not yet have a firm grasp on the requirements of AB 802 and the associated regulations. Messaging to this group should focus on the importance of gaining expertise in the benchmarking process, including the ENERGY STAR® Portfolio Manager tool, to help position the companies to offer benchmarking reporting services to their clients. “Train the trainer” resources such as FAQs and slide decks with compliance information will be valuable for this group, as they will be expected to respond to questions from their clients.

The CEC should strongly consider harnessing the desire that service providers have to use educating their current and potential clients about the regulations as a marketing opportunity. In Los Angeles and Chicago, for example, the local chapters of the U.S. Green Building Council provided service providers and other local partners with presentation templates that they could customize and reuse. Firms that agreed to follow basic guidelines in the use of these outreach materials could be approved to present on behalf of the benchmarking program as part of a formal speakers’ bureau, ensuring that information about the benchmarking program was being accurately conveyed.

Real Estate Attorneys and Agents

Who are they? Owner representatives, including real estate attorneys and agents, are hired by building owners to evaluate legal and leasing matters pertaining to the owner.

Why should they be involved? Experience in New York City revealed that it is more successful to persuade owner representatives to pay attention to the benchmarking requirements and then communicate this information to their clients than it is to engage owners directly.

What do they need to know? Purpose of energy benchmarking and compliance requirements.

³ Most active service provider list from ENERGY STAR:
<https://www.energystar.gov/buildings/facility-owners-and-managers/existing-buildings/save-energy/expert-help/find-energy-star-service-and>

Real Estate Entities with large California presence: The State Bar of California, California Association of REALTORS®, CCIM Institute, California Bureau of Real Estate.

Discussion: Engagement with real estate attorneys and agents should focus on how they can help their clients comply with the regulations. When Boston passed its benchmarking law, the city held workshops with the local American Bar Association chapter to spread the word to real estate attorneys, though their role diminished as their clients became more comfortable with the benchmarking law.

Real estate attorneys and agents must both take continuing education in order to maintain their licenses, so there is potential to incorporate messaging on the regulations into existing educational offerings. CalBRE provides an array of real estate services, including the regulation of continuing education for real estate agents and brokers, and they may be willing to offer continuing education credit for agents and brokers who attend a workshop or webinar dedicated to the upcoming benchmarking requirements. The workshop or webinar could include a discussion on how benchmarking and data access provisions can be added to landlord-tenant leases, thereby facilitating compliance with the new law. Industry conferences are another potential avenue for engaging these stakeholder groups.

It is worth noting that not all parties in this category have been supportive of the new benchmarking requirements. The CEC should be sensitive to the position of each party when determining which organizations could be best to actively partner with. Based on interactions to date, we suggest that the California Business Properties Association and the Building Owners and Managers Association International (BOMA) may be good potential partners for the CEC to consider.

Utilities

Who are they? Investor-owned companies, public power agencies, and municipally owned utilities that distribute electricity, gas, and thermal energy to end users, as well as community choice aggregators (CCAs) who source power resources for customers and are the default service provider in a region.

Why should they be involved? Utilities play a key role in providing building owners with whole-building energy use data, and are subject to specific data access provisions under AB 802. They can also be encouraged to incorporate benchmarking results into their energy efficiency incentive programs, to help measure and validate the effectiveness of their investments.

What do they need to know? The purpose of energy benchmarking, compliance requirements (specifically those related to data access), and the resources that will be made available to them.

Utilities with large California presence: Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), Sacramento Municipal Utility District (SMUD), Southern California Gas Company (SoCalGas), Los Angeles Department of Water and Power (LADWP), Southern California Public Power Authority (SCPPA), Northern California Power Agency (NCPA), California Municipal Utilities Association (CMUA), Marin Clean Energy (MCE), Sonoma Clean Power, Lancaster Choice Energy, and CleanPowerSF.

Discussion: Although building owners will not have to submit their first benchmarking report until 2018, AB 802 states that beginning January 1, 2017 utilities are required, upon request by a building owner or representative, to provide aggregated energy use data for a covered building to the requesting entity. Engaging utilities about the law and this current requirement is critical.

Although AB 802 and the associated regulations define the basic legal requirements, the process that is being developed by each utility to meet this requirement will have a major bearing on how easy it will be for building owners to comply. Because utilities will play such an important role in the success or failure of the regulations, the CEC should lead a concerted effort to not only inform utilities about the requirements, but to also encourage them to support the program in ways that will make it more effective. Some of the specific opportunities that the CEC could help utilities address are:

- Understanding best practices regarding the tools and processes that can be used by utilities to maintain and deliver whole-building energy use data, and to map individual meters to buildings.
- Developing consistent processes, web portals, and approval forms for building owners requesting whole-building energy use data.
- Coordinating with utilities, CCAs, and the California Public Utilities Commission (CPUC) to identify opportunities to incorporate benchmarking metrics into existing utility incentive programs.

The data access provisions in AB 802 will create an opportunity for utilities to actively engage with each of their larger customers, and can provide a timely opening for them to inform these customers about utility incentives and other energy efficiency support services.

Since energy benchmarking should result in some owners and managers upgrading their buildings to increase market competitiveness, the law should reduce energy demand and the need for utilities to invest in additional capacity, such as new power plants. By lowering energy consumption in the built environment, benchmarking can also help utilities meet their Energy Efficiency Resource Standard, if applicable. These are key messages that should be conveyed to utilities during the stakeholder engagement process.

Large Triple Net Tenants

Who are they? Industrial owners and logistics companies who pay real estate taxes, insurance, and maintenance for the buildings they occupy, in addition to rent.

Why should they be involved? Since buildings with a single large triple net tenant typically will not have three or more distinct utility accounts, AB 802 requires that the permission of these utility customers must be explicitly obtained prior to the utility aggregating and providing energy use data.

What do they need to know? The purpose of energy benchmarking, compliance requirements specific to their unique case, resources that will be made available to them, how they can use the data, and the value that agreeing to participate and release their energy use data will provide to them.

Likely large triple net tenants with a large California presence: Amazon, Digital, Target.

Discussion: AB 802 stipulates that for covered buildings with three or more active utility accounts, utilities must deliver aggregated whole-building energy use data to building owners upon request. However, a subset of buildings will have only one or two large tenants, resulting in fewer than three active utility accounts for the building. In such cases, customer permission must be secured before their energy use data can be aggregated with that of other customers in the building (if applicable) and provided to the building owner. If time allows, it would be beneficial for the CEC to identify the buildings that fall under this scenario and inform both the owners and tenants about the special circumstances.

State and Federal Government Agencies

Who are they? Federal and state government departments other than the CEC.

Why should they be involved? Many governmental departments and agencies outside of the CEC will have important roles to play in successfully implementing the regulations. State agencies will be

responsible for benchmarking their own buildings; federally owned and operated buildings, while not subject to the requirements, can be encouraged to participate voluntarily.

What do they need to know? Anticipated implementation needs and processes, data and data infrastructure needs, the value of a unified statewide buildings data set.

Key Agencies: U.S. Environmental Protection Agency (EPA), U.S. Department of Energy (DOE), U.S. Department of Housing and Urban Development (HUD), California Public Utilities Commission (CPUC), California Department of General Services (DGS), Strategic Growth Council (SGC), Governor's Office of Research and Planning, California Association of Port Authorities, California Department of Transportation, California Department of Housing and Community Development, California Department of Community Services and Development, California Natural Resources Agency, California Building Officials (CalBo), and the California Association of Councils of Governments (CalCOG).

Discussion: Several federal agencies, notably the DOE and the EPA, are responsible for developing and supporting tools and programs that will be foundational to the success of the regulations. For example, the California partners in the DOE's Better Buildings Challenge are potentially champions that the CEC could work with, or highlight in case studies. Coordinating with these federal agencies will help ensure that the CEC fully leverages the resources they provide, and will allow the CEC to inform and influence future design of the tools. The EPA manages development of Portfolio Manager, the required tool for benchmarking under the regulations, and can provide other valuable benchmarking resources. HUD should also be consulted to reconcile its benchmarking requirements with those in the regulations. At the state level, it is important that the CEC coordinate with CPUC staff and Commissioners so they understand the potential for benchmarking to be included in utilities' energy efficiency and distributed generation programs. These and other government agencies and departments should be made aware of program requirements as needed to improve the program's success.

Local Governments

Who are they? County, city, regional, and municipal government departments and publicly managed organizations.

Why should they be involved? Local governments are critical stakeholders because they own buildings covered under the regulations, have tax assessor information that will assist the CEC with compliance information, and often communicate directly with building owners, property managers, and tenants. County assessors'

offices can provide the data necessary to help identify individual buildings that are covered by the law. Local mayors' offices and sustainability departments in cities with existing or proposed benchmarking requirements will have to coordinate their own program activities with the requirements of the regulations. Local Government Partnerships (LGPs) and Regional Energy Networks (RENs) such as Southern California Regional Energy Network (SoCalREN) and the Bay Area Regional Energy Network (BayREN) could be instrumental allies in providing training and outreach, or even in directly implementing some aspects of the policy.

What do they need to know? The purpose of energy benchmarking, anticipated implementation needs and processes, data and data infrastructure needs of the policy, and how to align local programs with the requirements of AB 802.

Key agencies: Local Government Sustainable Energy Coalition (LGSEC), Local Government Coalition (LGC), City of Los Angeles, Los Angeles County, Berkeley Office of Energy & Sustainable Development, San Francisco Department of the Environment, San Diego Economic Development Department, Sacramento County Tax Assessor, SoCalREN, and BayREN.

Discussion: Since almost half of the buildings in California that are subject to the regulations reporting requirements are also subject to local benchmarking ordinances, aligning these policies and their reporting processes will minimize workload for the CEC, local governments, and building owners. Those cities with existing benchmarking laws can serve as early testing grounds to develop streamlined reporting processes, and may provide examples that can be used by the CEC to develop case studies on successful benchmarking practices. They can also help the CEC bring clarity to local stakeholders on the differences between the local and state laws, especially if the CEC provides these local governments with resources explaining the key differences.

Local governments, CCAs, and RENs can assist the CEC with outreach to local stakeholders by convening events and conducting webinars. It is especially important to convey information to all stakeholders who do not have to comply with local laws, but must comply with the state law. For example, in San Francisco the local benchmarking law does not currently apply to residential buildings. This means that while the city has been engaging with commercial building owners for years, the CEC may have to take a more direct role in informing owners of residential buildings about their new requirement to report under the California regulations. Conversely, the CEC could provide guidance to local governments that are considering

amending their local ordinances, so that the scope and requirements are consistent with the provisions of the state regulations.

Both the SoCalREN and the BayREN can assist the CEC with outreach to local governments by convening events and conducting webinars. The Energy Coalition, through its public sector work with the SoCalREN, is interested in helping the CEC populate its reporting system with public building data. The role of the RENs in private sector engagement will likely be limited, however, due to the presence of many other organizations (e.g. U.S. Green Building Council [USGBC], BOMA, and the Institute for Real Estate Management [IREM]) that are better positioned to assist.

It is important to note that the RENs represent small geographic portions of the state and are technically pilot projects that could be canceled by the CPUC. There may be some overlap between the role of RENs and the role of local government offices in those territories, so the RENs will not necessarily be the right coordinator in all cases. Also, the two RENs have different models and skill sets, so the CEC should independently evaluate the potential role that each can serve.

Recruit Key Partners

Thousands of stakeholders will be expected to submit annual benchmarking reports to comply with the regulations, and the CEC will have to make them all aware of this new requirement. While the CEC should devote some time and resources to directly engage with key stakeholders, stakeholder outreach will have to rely heavily on partners who can effectively engage with their own members.

These professional and non-profit organizations are often viewed as trusted sources of information and guidance by their constituents, so having them serve as the messenger can be more effective than having the CEC attempt to deliver information directly. IMT recommends that the CEC begin engaging key partners and providing them with resources no later than the third quarter of 2017, and then work with them to engage the aforementioned stakeholder groups. As there are many different organizations that the CEC could work with, it will be important to prioritize recruitment based on: (a) those organizations with the greatest desire and capacity to inform others, and (b) those with the greatest ability to reach key stakeholders. Ideally, the CEC will be able to identify several groups that will be proactive and help lead the stakeholder engagement process.

It is important to consider that every potential partner organization will have its own priorities and perspectives on the goals and value of this program. The messages these organizations present to their

own stakeholders will not necessarily be the same as, or even in agreement with, what CEC staff would have delivered. In order to make it as easy as possible for these partners to deliver a consistent and positive message, the CEC should create and distribute a set of targeted resources—including FAQs, one-page briefings, suggested talking points, sample PowerPoint presentations, links to the CEC benchmarking webpage, etc.—that can be easily adopted and reused by partners.

As the CEC engages potential partners, it should solicit feedback on the feasibility of having regional benchmarking help centers to assist stakeholders with compliance, in addition to or in lieu of a statewide help center. If this is deemed appropriate, the CEC will have to determine which organizations, potentially including the RENs, would be able to run these regional benchmarking help centers.

Trade and Professional Associations

Trade and professional associations are key sources for education and best practice sharing among members. California's size and national importance means that national trade organizations such as BOMA and IREM have large chapters in the state. The California chapter of the Association of Energy Service Professionals (AESP) and local Chambers of Commerce are also worth connecting with. In addition, there are many organizations that exist solely for state or local level professionals. These associations may be the single best source for spreading the message about the regulations.

Here is a list of key organizations, ordered based on our suggested decreasing priority for engagement:

- BOMA (state and regional chapters)
- IREM
- California Apartment Association
- NAIOP
- International Facility Management Association (IFMA)
- American Institute of Architects (AIA)
- California Chapter of the Association of Energy Service Professionals
- California Energy Efficiency Industry Council (CEEIC)
- California Business Properties Association
- Regional chambers of commerce
- California Housing Partnership Corporation (CHPC)

- American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)
- Association of Energy Engineers (AEE)

For-Profits

As noted previously, many large companies stand to benefit as trusted advisors and service providers that can help stakeholders comply with the new law. Some of these companies may be willing to assist with messaging through their own marketing capabilities. Some potentially supportive companies include:

- Yardi Systems, a leader in property management software, is an important and willing participant in the stakeholder engagement process. Many of Yardi's property management clients will be responsible for complying with the regulations
- Schneider Electric, a major international service provider that offers both technology and consulting solutions to thousands of customers in California alone
- Ecova, a leading utility bill payment service provider
- CBRE, JLL, and Cushman & Wakefield, leading brokerage and property management companies with the ability to influence billions of square feet of floor area.

Non-profits

The Center for Sustainable Energy (CSE) can provide assistance in a variety of ways, including identifying conferences appropriate to disseminate information on the regulations, co-hosting workshops focused on reporting requirements, and offering in-person and online benchmarking training. Headquartered in San Diego, with offices in Los Angeles and Oakland, CSE can also provide information on key stakeholders to engage at both the local and state levels. CSE currently operates benchmarking help centers for the Port of San Diego and San Diego County, and has worked closely with NCPA and SCPPA to provide public utilities information about utility data access best practices in preparation for the regulations compliance.

The U.S. Green Building Council has eight chapters throughout the state, many of which are likely to be interested in assisting the CEC with stakeholder engagement. Three USGBC chapters—Northern California, Los Angeles, and San Diego—cover the majority of the state, and should be the focus of the CEC's engagement with the USGBC. The Los Angeles Chapter of the USGBC (USGBC-LA) is partnering with the City of Los Angeles on stakeholder engagement for the Los Angeles benchmarking ordinance, and both USGBC-LA

and the City of Los Angeles would welcome incorporating information on the state program into their outreach materials. However, they both noted the importance of not confusing building owners and suggested that if the CEC provides Los Angeles, San Francisco, and Berkeley (the three jurisdictions with local benchmarking programs already established) with materials describing the state regulations, these materials should include a section on how the state regulations differ from the city ordinances, and in which instances a person should comply with one or the other. USGBC-LA is interested in supporting the CEC's stakeholder engagement process by disseminating information through its newsletter, webinars, and in-person events. In addition, the City is planning to pass along information to the CEC on buildings that have complied with the Los Angeles benchmarking law.

The California Housing Partnership Corporation (CHPC) is a non-profit organization dedicated to supporting government and non-profit housing agencies. CHPC is interested in supporting the CEC's outreach through its Green Rental Home Energy Efficiency Network (GREEN), which consists of approximately 80 non-profit affordable housing developers. CHPC can organize trainings for its non-profit owners via webinar or in-person events, although CHPC has found it difficult to convene many owners at the same time. CHPC can also help engage the market at conferences including "Housing California", as well as 2017 conferences hosted by the Non-Profit Housing Association of Northern California and the Southern California Association of Nonprofit Housing.

Other non-profit partners to consider at the local, regional and national level include:

- Environmental advocacy:
 - Institute for Market Transformation (IMT)
 - Urban Land Institute (ULI)
 - Environmental Defense Fund (EDF)
 - Energy Coalition
 - Natural Resources Defense Council (NRDC)
 - Green Cities California
 - Sierra Club
 - Verdani's Institute for the Built Environment (VIBE)
- Jobs and economic development:

- Labor unions including the International Brotherhood of Electrical Workers and the National Electrical Contractors Association
- California Advanced Lighting Control Training Program
- Blue Green Alliance
- Social justice:
 - Greenlining
 - California Environmental Justice Alliance
 - Asian Pacific Environmental Network
- Ratepayer advocates:
 - The Utility Reform Network
 - The CPUC's Office of Ratepayer Advocates

Each of these organizations should, at a minimum, be contacted and made aware of the implications of the regulations, so they can share this information with their membership and assess what role they may wish to play in promoting it.

Methods of Engagement

Although direct personal contact can be a very effective way to educate and inform stakeholders, the sheer magnitude of the program will make it impossible for this to be the only approach employed. In order to scale up the public awareness campaign we recommend that the CEC pursue multiple strategies in parallel, as outlined below:

Benchmarking Webpage

By creating a webpage dedicated to benchmarking, which includes a way for stakeholders to subscribe to the benchmarking mailing list, the CEC has already taken a good first step in the stakeholder engagement process. We recommend that the CEC organize the webpage such that key information is both easily visible and understood by all stakeholders who will have to comply with the law's requirements. Key information to highlight includes:

- The specific buildings required to comply
- The benefits of benchmarking
- A high-level overview of the requirements, including options for compliance and distinguishing between owner and utility customer obligations

- Market participants responsible for compliance
- Compliance deadlines
- Schedule for public reporting and disclosure
- Penalties for noncompliance
- Support resources (e.g. How-To Guide and Compliance Checklist)
- Contact information for specific stakeholder groups seeking guidance
- Notices for upcoming trainings and webinars
- Help desk contact information

We suggest that the CEC review the benchmarking websites of cities such as Chicago, New York City, Seattle, and Washington D.C. for examples of effective web sites, and ideas on what to include.

Some of the messaging described earlier in this plan can be used to explain the benefits of benchmarking to the relevant parties. The CEC should also focus on increasing traffic to its webpage. This can be accomplished by referencing the webpage as a resource when engaging stakeholders via newsletters, webinars, and in-person events. The webpage can also serve as a way to promote these other stakeholder engagement strategies by providing links to articles in trade publications describing the regulations, as well as publicizing the dates and locations of webinars and in-person events promoting the law. **IMT recommends that the CEC make these changes to its benchmarking webpage in the third quarter of 2017.**

Key Partner Publications

One of the goals of identifying organizations that can assist the CEC with stakeholder engagement is to leverage these partners' communication channels to share information about the regulations with large audiences. Communication channels can include blogs available to the public, as well as newsletters and journal articles read by subscribers. Messaging should be tailored depending on the membership profile of the organization. For example, an article in the California Apartment Association's newsletter should focus on the residential benchmarking requirements.

Webinars

Webinars should be a high priority engagement strategy for the CEC. The upside of conducting webinars is convenience, as neither presenters nor attendees have to travel to a specific location to participate. Webinars can be tailored to narrow or broad audiences,

and presenters can include the CEC and partner organizations. Verdani has done many Portfolio Manager trainings, and would likely be interested in doing so for the benchmarking program. Experience with stakeholder engagement in Los Angeles has shown the importance of being armed with data, and following up on attendee feedback during webinars and in-person events, as described below.

The largest challenge with webinars is likely to be effectively publicizing them to achieve high participation levels. To maximize attendance, a calendar of upcoming webinars should be posted on the CEC website, and notices should be included in the newsletters and announcements distributed by partner organizations.

In-Person Events

While in-person events require individuals to travel to a certain location and are thus less likely than webinars to attract participants from across the state, they are an effective way to engage targeted stakeholders. In-person events can take place at previously scheduled conferences, or can be held as workshops created specifically for the purpose of disseminating information about the regulations. As with webinars, in-person events can be led by the CEC or partner organizations, and can address broad or narrow audiences.

Recommendations

2017 is going to be a critical time for the CEC to lay the foundation for successful deployment of the regulations and associated reporting and data collection requirements. Based on the background on stakeholder groups and methods of engagement described above, we have included our recommendations below for tasks that the CEC should execute as part of the pre-regulation stakeholder engagement process, and the outputs that would be generated under each task.

- 1. Task 1: Engage with local partners and allies to amplify messages:** The CEC should work with 10 of the most influential trade, professional real estate, non-governmental, and other energy efficiency oriented organizations in the state, who can help share information about the regulations with their respective constituents. The CEC should also initiate a campaign to raise awareness among energy efficiency firms that may provide direct services to individual building owners. This would include setting up a structure and guidelines for these parties to be fully involved in promoting the policy, such as establishing a speakers' bureau to help promote the program. Additionally, the

CEC should identify any upcoming conferences, blogs, newsletters, training opportunities, etc. where information to raise awareness about the regulations could be shared, and should develop an initial set of informational resources, including a two-page overview and a one- to two-page compliance checklist. Finally, the CEC should produce initial drafts of a step-by-step How-To-Guide and FAQs. Though the release versions of these resources cannot be completed until after the regulations are adopted, preparing the initial drafts before then will minimize the time needed to finalize them after the regulations are approved.

Suggested Outputs:

1. List of top 10 partner organizations, with key contacts identified for each.
2. Initial contact established with each key contact.
3. Informational webinar and/or conference call with each of the ten partners noted under Output 1 of this Task.
4. Online group meeting with all ten potential partner organizations identified under Output 1.
5. Listing of newsletters, conferences, internal meetings, and other opportunities for disseminating information about the regulations from Q3 of 2017 through Q2 of 2019.
6. Two webinars to service providers across California, to provide background information and potential business and partnering opportunities.
7. Template PowerPoint deck describing the regulations, for use by partners to communicate requirements and expectations to their constituents.
8. Background article on the regulations, for submission to a newsletter or other publication produced by a partner organization.
9. Two-page overview document that describes the intent of AB 802, key dates, who has to report, and where to go for further information.
10. Compliance checklist.
11. Initial draft of FAQs.
12. Initial draft of step-by-step How-To guide.

2. **Task 2: Initial stakeholder engagement with private real estate markets.** Many building owners and property managers who will be responsible for benchmarking their buildings are members of the organizations targeted under Task 1, and will have heard about the regulations through those channels. However, those firms with the largest property holdings in the state warrant direct engagement from the CEC. Although the CEC cannot provide detailed guidance on how to comply with the

regulations until after they are finalized, proactive conversations with these firms will give them adequate time to prepare for the deadlines, and will help minimize the potential for misinformation to spread. The CEC should identify the appropriate contacts within the largest building owners and property management firms in California, hold an informational one-on-one discussion and/or webinar with each to make sure they are aware of upcoming requirements, and identify any upcoming internal newsletters or training opportunities where staff could learn about the regulations.

Suggested Outputs:

1. List of key contacts at the top 15 building owners by square footage, the top 10 building owners by number of disclosable buildings, and the top 15 property management firms
 2. Webinar and/or conference call with each of the top building owners and property management firms identified under Output 1
 3. Brief summary of talking points developed for the calls, and key issues, concerns, and opportunities raised during each of the meetings under Output 2 of this Task
 4. Summary list of internal newsletters, meetings, or other opportunities for disseminating information
 5. Updated website that includes relevant information and guidance surrounding implementation, and addresses key issues identified under this Task
3. **Task 3: Initial stakeholder engagement with cities.** The CEC should work with the California cities with existing benchmarking ordinances (Los Angeles, San Francisco, and Berkeley), as well as any cities that are considering local requirements, to ensure that they (a) are all fully aware of the implications of the regulations, (b) will have a viable process in place to share data with the CEC, and (c) have benchmarking and reporting requirements that will fully meet the requirements for receiving a local exemption as defined in the draft regulations. In addition, the CEC should identify how best to coordinate training, help desk, and other support services between local efforts and those activities that the CEC will be providing.

Suggested Outputs:

1. Memorandum on readiness of cities with local ordinances (Los Angeles, San Francisco, and Berkeley) to report benchmarking data to the CEC for the 2018 reporting deadline (including alignment of policies and technical readiness)
2. Reference materials for Los Angeles, San Francisco, and Berkeley that explain how the state regulations differ

from the respective local benchmarking laws, and in which instances a person is required to comply with one or the other.

4. **Task 4: Coordination with utilities.** Building owners need to be able to request and receive aggregated energy use data from utilities in a manner that, while protecting the privacy of sensitive information, is as streamlined and efficient as possible. The CEC should coordinate with a subset of the major investor owned utilities (IOUs) and publicly owned utilities (POUs) to assist them in fulfilling on the data access requirements of AB 802. To facilitate this work, we recommend that the CEC organize monthly utility working group calls to share best practices and track the readiness of utilities to provide whole building data. The CEC should also gather feedback from building owners and utilities on ease of use and the general customer experience of stakeholders who are requesting utility data, and use this input to develop recommendations on opportunities for process improvements.

Suggested Outputs:

1. Monthly utility coordination calls
 2. Identification of areas where compliance may be an issue, or where process steps are not as streamlined for data requestors as they could be. These should be shared with utilities and would inform Output #3.
 3. Memorandum documenting the readiness of utilities to (a) meet baseline regulatory requirements related to data access, and (b) provide a streamlined experience for data requestors. This should include documenting similarities and differences in user experience (documents required for submission, process of making request, necessity of online account, etc.) between utilities based on monthly calls, desk research, and interviews with building owners.
 4. Memorandum providing recommendations for standardization across utilities on at least the following: (a) a statewide data request form, and (b) the documents that are required to demonstrate ownership and tenant consent.
-
5. **Task 5: Coordination with federal agencies.** The CEC should ensure that the DOE, EPA, and HUD are fully aware of the requirements and status of implementation, and that guidance documents, tools, training materials, and other resources that could be helpful to the CEC's efforts are made available. The Commission should also work with the DOE's Standard Energy Efficiency Data (SEED) Platform and Asset Score development

teams to coordinate development and deployment of these tools as appropriate to deliver on the data infrastructure needs of the CEC and reporting cities. Similarly, the CEC should work with the EPA's Portfolio Manager team to coordinate implementation of the tool, including developing reporting templates.

Suggested Outputs:

1. Identify EPA resources that will be most helpful to the CEC and stakeholders
2. Coordinate scheduling of in-person "Train the Trainer" sessions for staff and partners who will be engaging stakeholders on these topics
3. Coordinate between DOE initiatives (SEED, Asset Score, and other applicable data tools) and the CEC's data infrastructure development team
4. Coordinate between the EPA Portfolio Manager team and the CEC

Post-Rulemaking, Pre-Reporting Stakeholder Engagement

Purpose

The trainings and resources delivered before the regulations have been finalized are largely intended to increase stakeholder understanding of benchmarking and its benefits. Once the regulations are approved, the CEC will be able to offer more detailed trainings and more precise resources describing the law. In general, while pre-regulation stakeholder engagement should focus on raising awareness, the goal for this second phase of engagement shifts to describing the concrete steps needed to comply with the law. With the first reporting deadline scheduled for June 2018, the latter half of 2017 and beginning of 2018 are critical times to train responsible parties how to comply.

Key Activities for Post-Rulemaking, Pre-Reporting Stakeholder Engagement

While this guide focuses primarily on the activities that will occur before the regulations are approved, below is a high level overview of some of the activities that the CEC and its partners should be prepared to complete as the CEC moves into the initial implementation phase.

- Finalize resources describing the law and how to comply, including a How-To guide, a compliance checklist, and FAQs.

- For each stakeholder group (building owners, property managers, energy service providers, real estate attorneys, real estate agents, utilities, large triple net tenants, state and federal government agencies, and local governments), offer detailed trainings describing the law and compliance requirements.
- Templated training materials for use by partner organizations.
- Update the CEC website to include relevant information and guidance surrounding program implementation.
- Create a benchmarking help center as a resource for stakeholders who have questions about compliance and improving building performance.
- If time and resources allow, develop a program recognizing early adopters (building owners that have complied with the AB 802 reporting requirements well before the initial deadlines).

In-depth Trainings

The CEC should begin to offer detailed trainings as soon as the regulations are officially adopted. These trainings should build on the educational offerings from earlier in 2017, and inform the key stakeholders outlined in the preceding section of this report. The CEC should identify lessons learned from its initial stakeholder engagement, such as its most capable and willing partners, as well as the most effective means of conveying information, and take advantage of these strategies during this round of stakeholder engagement. While the key partners and engagement strategies are likely to remain largely unchanged, the messaging will be adjusted to focus on the details of compliance. The CEC may have limited capacity to administer all of the below trainings directly, and in many cases should work with the EPA and employ the “Train the Trainer” approach to leverage the additional capacity of its partner organizations. In this post-rulemaking stage of stakeholder engagement, the CEC will be relying on many key partners to lead trainings and share specific compliance information with their base. The CEC should provide sample slide decks and other training resources that these partners can use to develop their curriculum. The following topics, in this order, should be covered during stakeholder trainings:

Disclosable and Covered Buildings

The definitions of disclosable buildings (those for which benchmarking data must be reported to the CEC) and covered buildings (those for which utilities are required to provide energy use data upon request) are being finalized during the regulations process. The stakeholder trainings should define these two important building categories, as well as describe their respective roles in the regulations. An explanation of buildings exempt from the reporting requirements should be included as well.

Requesting Energy Use Data

Representatives of covered and disclosable buildings can request and must report, respectively, their building's energy data from the previous calendar year. The process for requesting building energy data should be explained during trainings for building owners, property managers, energy service providers, and any other stakeholder that may be responsible for requesting the data. The first deadline for disclosable building representatives to request energy use data from their utility is March 2018. Therefore, trainings on how to request energy use data should be scheduled frequently throughout the second half of 2017.

Utility Requirements

Educating utilities on the law's requirements is a critical component of ensuring that stakeholders are well informed and served. The AB 802 regulations will address utility companies' various requirements under the law, so the CEC should create a training geared specifically toward utilities, to discuss important issues such as data aggregation and data transmission procedures. These more detailed trainings can build on the utility engagement conducted prior to the regulations being finalized.

Reporting and Disclosure

The specific details describing how responsible parties (building owners, property managers, and energy service providers) should report benchmarking data should be covered extensively during trainings. This includes opening an ENERGY STAR Portfolio Manager account, entering information, uploading data, and reporting deadlines. In addition, the timeline for public disclosure of benchmarking data should be detailed.

Violations and Enforcement

Benchmarking stakeholders, especially building owners, should be made aware of various potential violations and respective penalties which could be assessed.

Resources

Key Documents

Once the regulations have been finalized, the CEC should produce and distribute easy-to-understand documents highlighting key aspects of compliance. If the final regulations differ from the information previously communicated to stakeholders, these changes should be emphasized in summary documents and stakeholder trainings. The CEC should create the following resources during this time, if they have not already been produced:

- Energy benchmarking notification letter
- “Do I Need To Comply” flow chart/infographic
- Compliance checklist
- How-to-Guide on benchmarking
- Training video(s)
- FAQs
- Information on requesting data from utilities
- Help center information

Benchmarking Webpage

Once the regulations are finalized, the CEC will want to include the regulations on its benchmarking page. In addition, the webpage should be updated to include the new resources created, and a schedule of upcoming trainings.

Benchmarking Help Center

A benchmarking help center is a critical resource for stakeholders who have questions about compliance with the regulations. Depending on its anticipated capacity, the CEC could manage the benchmarking help center or, alternatively, identify another entity to administer a benchmarking help center. With the first reporting deadline for disclosable buildings likely to be June 2018, a benchmarking help center should be up and running at the onset of 2018.

Early Bird Reporting Recognition Program

One way to encourage early reporting of benchmarking data is to create a program recognizing building owners who comply with the reporting requirements well before the deadline. Montgomery County, MD has used this model to encourage stakeholders within the county to report early. The CEC could establish an early-bird

reporting deadline—perhaps three months prior to the normal annual reporting deadline in June. Those building owners that submit their benchmarking data prior to the early reporting deadline would be highlighted on the CEC benchmarking webpage and in other benchmarking materials.

We recognize that developing an Early Bird Recognition Program may require more time and resources than the CEC has. However, if the CEC does decide to proceed with this, the Energy Commission should develop a resource explaining the program, and include details of the program in stakeholder trainings.

Post-Rulemaking, Post-Reporting Stakeholder Engagement

Purpose

The first year of reporting will establish compliance and data quality standards to improve upon in subsequent years. After the first reporting deadline in June 2018, the CEC should turn its focus towards assessing the first year’s compliance with the regulations, and improving the quality of reported data.

Key Activities

- Assess initial compliance with the law.
- Continue to clearly communicate the benefits of benchmarking to each stakeholder group.
- Work to improve the quality of reported data, and identify where there are needs for additional guidance and technical support for those reporting.

Compliance

Once the first reporting deadline passes, the CEC can assess initial compliance. This first year compliance statistic will become a benchmark that the CEC and stakeholders should aim to improve upon in subsequent years.

Levying penalties for non-compliance acts as a “stick” to improve stakeholder compliance with the law. While this is a necessary action outlined in the following “Enforcement” section, the CEC and partners should also continue to clearly communicate the benefits of benchmarking and the ease of compliance. Initially, this “carrot”

approach should be the primary strategy to improve future compliance.

Enforcement

Enforcement of the regulations is critical to uphold the integrity of the law. In an ideal world, all stakeholders would see the benefits of benchmarking and want to comply with the law regardless of the penalties for non-compliance. In reality, some stakeholders will not perceive these benefits. Thus fines for non-compliance are a necessary means to drive reporting by these individuals. To support enforcement, the CEC should develop a violation warning letter that includes resources to help with compliance.

The regulations will specify the conditions under which building owners and utilities will be considered to be in violation of the law, and will define their opportunities to correct the violation before being assessed a fine.

Data Quality

In addition to rates of compliance, the CEC should also be concerned about the quality of reported data. While Portfolio Manager can flag certain data anomalies, there will be instances in which bad data is not caught by Portfolio Manager's filters and manual data inspection is necessary. The CEC should also work with utilities to continue to improve the quality of data uploaded to Portfolio Manager, such as identifying and correcting any situations where meters are not correctly associated with buildings.

The CEC and partners should commit to continuously making the program more effective by setting goals to increase the number of compliant buildings and to improve the quality of reported data.

Conclusion

Stakeholder engagement is critical to the success of California's statewide benchmarking program. The parties responsible for benchmarking compliance should be informed of the law's requirements as early as possible, to avoid potential confusion and frustration as deadlines approach. To maximize the efficiency with which benchmarking information is communicated to stakeholders, the CEC should identify partner organizations that are well positioned to assist with stakeholder outreach. The CEC should craft messaging that targets the stakeholder group being engaged, and should identify the most effective forums for conveying information.

It is critical that the CEC identify “champions” of building energy efficiency within the state, as these organizations and individuals can play an outsized role in supporting efforts to promote the new benchmarking requirements. Real estate companies that champion energy efficiency recognize its financial benefits and are likely to have goals and strategies to improve the energy efficiency of their portfolios of buildings, while non-profit and industry group champions focus on promoting the benefits of building energy efficiency to their members and the public. This stakeholder engagement guide has identified organizations that champion building energy efficiency, and that the CEC should work with.

The stakeholder engagement work that will occur prior to finalizing the regulations is essential for laying the groundwork for future outreach. While this plan focuses on outreach efforts prior to when the regulations are finalized, it also briefly describes the important work to be done later. IMT hopes this plan provides the CEC with a solid starting point for stakeholder engagement, and looks forward to working with the CEC to carry out some of these efforts.

Acknowledgements

This report was completed by the Institute for Market Transformation for the Pacific Coast Collaborative in June 2017.

The information, data, or work presented herein was funded in part by the Office of Energy Efficiency and Renewable Energy (EERE), U.S. Department of Energy under Award Number DE-EE0006890.

About the Institute for Market Transformation (IMT)

The Institute for Market Transformation (IMT) is a national nonprofit organization based in Washington, DC that promotes energy efficiency, green building, and environmental protection in the United States and abroad. IMT's work addresses market failures that inhibit investment in energy efficiency and sustainability in the building sector. For more information, visit imt.org.

About the Pacific Coast Collaborative (PCC)

The Pacific Coast Collaborative (PCC) was launched in 2008 to set a cooperative direction in key policy areas of mutual interest among North America's west coast jurisdictions. In 2013, the governors of California, Oregon, and Washington and the Premier of British Columbia announced the Pacific Coast Action Plan on Climate and Energy as an initiative of the PCC, outlining a set of shared goals for reducing carbon emissions and building a clean energy economy on the west coast. With a population of 54 million people and an economy that is the fifth largest in the world, the west coast jurisdictions that compose the PCC are demonstrating that transitioning to a low-carbon economy can create jobs and support robust economic growth. For more information, visit www.pacificcoastcollaborative.org.

Disclaimer

The information, data, or work presented herein was funded in part by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, products, or process disclosed, or represents that its use would not infringe privately owned rights. Reference herein to any specific commercial product,

process, or service by trade name, trademark, manufacturer, or otherwise does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency thereof. The views and opinions of authors expressed herein do not necessarily state or reflect those of the United States Government or any agency thereof.

The information, data, or work presented herein was produced in collaboration with the Pacific Coast Collaborative. The views and opinions of the authors expressed herein do not necessarily state or reflect the Pacific Coast Collaborative's endorsement of specific policies or programs.

