

# Comparison of U.S. Commercial Building Energy Benchmarking and Transparency Policies

October 2021



Jurisdiction	Year Enacted	Policy Impact					Policy Schedule		Additional Elements			Status Updates		
City/State		# of Bldgs	Sq. Ft. in millions	Energy Savings	Covered Bldgs List Available	Types of Real Estate and Sizes (Sq. Ft.)	Reporting to Gov't	Transparency	Water Tracking	Further Action	Compliance Rate of Bldgs	Compliance Rate of Sq. Ft.	Benchmarking Data Available	
CA	2015	-	-	-	No	Comm ≥ 50,000 MF ≥ 50,000 and 17 or more residential utility accounts	June 1, Annual	After June 1, Annual	-	-	-	-	No	
CO	2021	8,830	1.23 billion	-	Yes	MF & Comm ≥ 50,000 Public/Gov't ≥ 50,000	Dec 1, 2022 and June 1 annually thereafter	Annual, Date TBD Time of sale or lease	N	BPS requirements TBD in rulemaking.	-	-	No	
NJ	2018	-	-	-	-	Comm ≥ 25,000	Annual	-	Y	-	-	-	-	
WA	2009	4,600	247	-	-	Comm ≥ 10,000 Public/Gov't ≥ 10,000	July 1, Annual	Annual	N	-	-	-	-	
Ann Arbor MI	2021	-	-	-	No	MF & Comm and Public/ Gov't ≥ 10,000 (Covered city properties for 2022, City & Non-City hereafter) ≥ 100,000 (for 2023) ≥ 50,000 (for 2024) ≥ 20,000 (for 2025)	Dec 1, 2021 and June 1 annually thereafter	Annual	Y	-	-	-	No	
Atlanta GA	2015	2,900	402	-	Yes	Comm & MF ≥ 25,000 Public/Gov't ≥ 10,000	June 1, Annual	(if ENERGY STAR >55) Sept 2018	Y	Energy audits every 10 years for commercial bldgs 25,000 sq. ft. or larger.	-	-	Yes	

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Austin TX	2008	2,800	113	-	No	Comm ≥ 10,000 MF ≥ 5 units Public/Gov't ≥ 10,000 All Single Family	June 1, Annual	Time of transaction	N	Energy audit required before time of sale for homes 10 years or older and for all multifamily bldgs that are 10 years or older and have five or more units.	-	-	Yes	
Berkeley CA	2015	257	13.7	-	Yes	Comm & MF ≥ 25,000 Public/Gov't ≥ 25,000	June 1, Annual July 1, Annual	No publication date	Y	Energy audit prior to sale for commercial and multifamily bldgs 25,000 sq. ft. or larger.	-	-	-	
Bloomington MN	2021	450	-	-	No	MF & Comm ≥ 100,000 (for 2022) ≥ 75,000 (for 2023) All Public/Gov't ≥ 75,000 (for 2021)	June 1, Annual	Aug 30, the following year	N	Commercial 20,000 sf or larger. 10,000 sq. ft. or larger for buildings built after 2014.	-	-	Yes	
Boston MA	2014	1,600	250	-	Yes	Comm ≥ 35,000 MF ≥ 35,000/35 units All Public/Gov't	May 15, Annual	Oct 1, Annual	Y	Audit or energy action every five years for commercial and multifamily bldgs 25,000 sq. ft. or larger. Actions are significant investment in efficiency, comprehensive energy management plan, or retrocommissioning of energy systems. bldgs over 50,000 sq. ft. have more stringent requirements.	73% (2014)	84% (2014)	Yes	
Boulder CO	2015	475	26	-	Yes	Comm ≥ 20,000 Public/Gov't ≥ 5,000	June 1, Annual	June 1, the following year	Y	Commercial 20,000 sf or larger. 10,000 sq. ft. or larger for buildings built after 2014. Energy audit and retrocommissioning (RCx) every 10 years; owner must implement any RCx measure with payback of 2 years or less.	99% (2018)	29 million sq. ft. subject to compliance.	Yes	
Cambridge MA	2014	1,100	78	-	Yes	Comm ≥ 350,000 MF ≥ 35 units All Public/Gov't	May 1, Annual	Sept 1, Annual	Y	-	91% (2016)	85.5% (2014)	Yes	
Chicago IL	2013	3,500	900	7.6% (2016-2019)	Yes	Comm & MF, Public/Gov't ≥ 50,000	June 1, Annual	After June 1, Annual	N	-	91% (2019)	96% (2019)	Yes	
Chula Vista CA	2021	840	35	-	No	Comm & MF ≥ 50,000 Public/Gov't ≥ 20,000	Mar 20, 2022 May 20, 2022	To existing and prospective tenants and owners/buyers	N	Building performance standards requirements begin in 2023 for bldgs ≥ 50,000 sq. ft. and 2026 for bldgs ≥ 20,000 sq. ft.	-	-	No	

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Columbus OH	2020	-	-	-	No	Commercial ≥ 50,000 MF ≥ 100,000 Public/Gov't ≥ 25,000	June 1, 2021, Annual June 1, 2022, Annual	After June 1, Annual	Y	-	-	-	No	
Denver CO	2017	3,000	360	0.4% (2020)	No	Comm & MF ≥ 25,000 Public/Gov't ≥ 25,000	June 1, Annual	No publication date	N	-	90% (2018)	74.6% (2018)	Yes	
Des Moines IA	2019	-	-	-	No	Comm ≥ 50,000 Public/Gov't ≥ 50,000	June 1, Annual	After June 1, Annual	Y	-	-	-	No	
Edina MN	2019	-	-	-	Yes	Comm & MF ≥ 50,000 Public/Gov't All	June 1, Annual	After June 1, Annual	N	Energy assessment every five years for commercial and multifamily bldgs 50,000 sq. ft. or larger.	-	-	Yes	
Evanston IL	2016	557	45.6	-	Yes	Comm & MF ≥ 20,000 Public/Gov't ≥ 10,000	June 30, Annual	No publication date	Y	-	-	-	Yes	
Fort Collins CO	2018	2,250	47	-	Yes	Comm ≥ 20,000 (for 2020) Comm ≥ 10,000 (for 2021) Comm ≥ 5,000 (for 2022) MF ≥ 20,000 (for 2021) MF ≥ 10,000 (for 2022) MF ≥ 5,000 (for 2023) Public/Gov't ≥ 20,000	Mar 1, Annual	Annual	Y	-	-	-	No	
Indianapolis IN	2021	1,861	283	-	No	Comm & MF ≥ 100,000 (for 2023) ≥ 50,000 (for 2024) Public/Gov't ≥ 25,000	June 1, Annual	Annual in 2026	Y	-	-	-	No	
Kansas City MO	2015	~1,500	~400	-	No	Comm & MF ≥ 100,000 Public/Gov't ≥ 10,000	May 1, Annual	Sept 1, Annual	Y	-	56.2% (2020)	-	Yes	
Los Angeles CA	2016	1,908, or 1,400	900	-	No	Comm & MF ≥ 20,000 Public/Gov't ≥ 7,500	June 1, Annual	After June 1, Annual	Y	Energy audit and retrocommissioning every five years for commercial and multifamily bldgs 20,000 sq. ft. or larger.	82% (2016)	-	Yes	

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Miami FL	2021	2000	-	-	No	Comm & MF and Public/Gov't All covered properties ≥ 200,000 (for June 2023) ≥ 100,000 (for Oct 2023) ≥ 50,000 (for 2024) ≥ 20,000 (for 2025)	June 30, 2023, Annual	Dec 1, 2023, Annual	Y	-	-	-	No	
Minneapolis MN	2013	991	-	5.5% (2014-18)	Yes	Comm & MF ≥ 50,000 Public/Gov't ≥ 25,000	June 1, Annual	Aug 31, Annual	Y	-	Commercial 93% Multifamily 84% (2018)	-	Yes	
Montgomery Co MD	2014	~1,000	~110	2.5% (2017-19)	Yes	Comm ≥ 50,000 All Public/Gov't	June 1, Annual	Oct 1, Annual	N	-	55.2% (2016)	-	Yes	
New York City NY	2009	15,614 33,417	2,800	6-14% (2010-14)	Yes	Comm & MF ≥ 25,000 All Public/Gov't	May 1, Annual	Sept 1, Annual	Y	Energy audits and retrocommissioning every 10 years for commercial and multifamily bldgs 50,000 sq. ft. or larger.	84% (2012)	-	Yes	
Orlando FL	2016	826	125.6	-	Yes	Comm & MF ≥ 50,000 Public/Gov't ≥ 10,000	May 1, Annual	Sept 1, 2019	N	Energy audit or retrocommissioning every five years for bldgs with ENERGY STAR scores below 50.	-	-	Yes	
Philadelphia PA	2013	2,900	390	-	No	Comm, MF ≥ 50,000 Public/Gov't ≥ 10,000	Jun 30, Annual	After June 30, Annual	Y	Tune-ups every five years for commercial bldgs 50,000 sq. ft. or larger.	85% (2019)	20% of total citywide sq. ft. (2019)	Yes	
Pittsburgh PA	2016	861	164	-	Yes	Comm ≥ 50,000 All Public/Gov't	June 1, Annual	After June 1, Annual	Y	-	-	-	Coming soon	
Portland ME	2016	284	-	-	Yes	Comm ≥ 20,000 MF ≥ 50 units Public/Gov't ≥ 5,000	May 1, Annual	Sept 1, 2019	Y	-	-	-	No	
Portland OR	2015	1,024	87	2.7% (2016-19)	No	Comm ≥ 20,000 Public/Gov't ≥ 20,000	Apr 22, Annual	Oct 1, Annual	N	-	93.4% (2017)	-	Yes	

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Reno NV	2019	500	25	-	Yes	Comm & MF ≥100,000 Public/Gov't ≥ 10,000	April 1, Annual	No publication date	Y	Commercial bldgs and multifamily properties 30,000 sq. ft. or larger and municipal properties 10,000 sq. ft. or larger that are not meeting performance targets every seven years must do an audit or retuning.	-	-	No	
Salt Lake City UT	2017	1,211	124	-	No	Comm ≥ 25,000 Public/Gov't ≥ 3,000	May 1, Annual	No publication date	N	Tune-ups every five years for commercial bldgs 25,000 sq. ft. or larger.	-	-	No	
San Diego CA	2019	-	-	-	Yes	Comm ≥ 50,000 MF ≥ 50,000 and 17+ residential utility accounts	June 1, Annual	After June 1, Annual	Y	-	-	-	No	
San Francisco CA	2011	2,312	203	7.9% (2010-14)	Yes	Comm ≥ 10,000 Public/Gov't ≥ 10,000 Residential ≥ 50,000	Apr 1, Annual	After Apr 1, Annual	Y	Energy audit every five years for Commercial bldgs 10,000 sq. ft. or larger. Bldgs 50,000 sq. ft. or larger have more stringent requirements.	50,000+ sq. ft.: 82% 25-50,000 sq. ft.: 52% 10-25,000 sq. ft.: 39% (2014)	-	Yes	
San Jose CA	2018	2,500	250	-	Yes	Comm & MF ≥ 20,000 Public/Gov't ≥ 15,000	May 1, 2019	After May 1, Annual	Y	Commercial and multifamily bldgs 20,000 sq. ft. or larger not meeting performance target every five years must do an audit, retrocommissioning, or undertake energy efficiency improvement measures.	-	-	No	
Seattle WA	2012	-	-	3.7% (2014-16)	No	Comm & MF ≥ 20,000 Public/Gov't ≥ 20,000	Apr 1, Annual	After Apr 1, Annual	N	Building tune-up every five years for commercial 50,000 sq. ft. or larger.	99% (2016)	-	Yes	
South Portland ME	2017	-	-	-	Yes	Comm ≥ 5,000 MF ≥ 10 units Public/Gov't ≥ 5,000	May 1, Annual	Sept 1, Annual	Y	-	93% (2018)	93% (2018)	Yes	
St. Louis MO	2017	-	-	-	Yes	Comm & MF ≥ 50,000 Public/Gov't ≥ 50,000	Apr 1, Annual	Aug 1, Annual	Y	-	61% (2017)	-	No	
St. Louis Park MN	2019	275	52% of city's total bldgs sq. ft.	-	Yes	All except industrial ≥ 25,000	June 1, Annual	Sept 1, Annual	Y	-	-	-	Yes	

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St. Paul MN	2020	2,000	357	-	Yes	Comm & MF ≥ 25,000 Public/Gov't ≥ 25,000	Full: June 1, Annual Partial: June Annual	Full: June 1, Annual Partial: June Annual	Y	-	-	-	Yes	
Washington DC	2008	2,000	357	9% (2010-13)	Yes	Comm & MF ≥ 50,000 Public/Gov't ≥ 10,000	Apr 1, Annual	After Apr 1, Annual	Y	-	-	-	Yes	