

Topic: Energy Efficiency and Sustainable Design of Federal Buildings
Dockets: EE-RM/STD-02-112 / RIN: 1904-AC13, RIN: 1904-AB96
Date: September 2, 2010
Attendees: Tim Ballo and Emma Cheuse (Earthjustice); Kit Kennedy, Christine Chang, and Meg Waltner (Natural Resources Defense Council); Cliff Majersik (Institute for Market Transformation)

Summary of Issues:

- *DOE leadership on building standards is urgently needed to address climate change.*
 - DOE must meet all overdue legal responsibilities for the energy efficiency of Federal buildings, including list from DOE-EERE-OT-2010-0007-0071, *e.g.*:
 - Promulgate the overdue fossil-fuel reduction rule.
 - Promulgate the overdue updates to Federal building energy efficiency standards to reflect and require compliance with new ASHRAE, IECC.
 - Establish overdue web-based tracking system to collect and report energy and water use, and make the system publicly available and accessible.
 - Integrate DOE's efforts under E.O. 13514 with statutory requirements on energy efficiency, *e.g.*, coordinate GHG accounting portal with the web-based system.
 - DOE should use its full legal authority to design rules and guidelines to maximize energy efficiency of Federal buildings and minimize greenhouse gas emissions. Leave no available savings on the table.
 - Evaluation, verification, and public information on energy efficiency and energy use will improve agency accountability and stakeholder confidence.

- *Comments specific to the proposed rule:*
 - Apply the principles to all new Federal buildings.
 - Remove practicability loophole (i.e., including "to the extent practicable")
 - Remove 3% first cost threshold.
 - Include environmental benefits and externalities in LCC analysis.
 - DOE should make LCC determinations; not case-by-case at the building level.
 - Water efficiency
 - Collect and report energy use data. *E.g.*, COMNET Energy Modeling Guidelines and Procedures, Energy Star

- *Other related issues*
 - ICC 2010 Annual Conference and Group B Final Action Hearings
 - State building codes
 - Appliance standards

For further reference, *see* Doc. ID Nos. EERE-OT-2010-0007-0064 and DOE-EERE-OT-2010-0007-0071 available at www.regulations.gov.