



Shaping Tomorrow's
Built Environment Today

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November 8, 2024

Wendy Simons
Rules Coordinator
Oregon Department of Energy
550 NE Capitol St First Floor
Salem, OR 97301

Re: Notice of Proposed Rulemaking, Division 330-300: Building Energy Performance Standards

Sent via email to: wendy.simons@energy.oregon.gov

Dear Ms. Simons,

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 53,000 members, including over 500 in Oregon, focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

We appreciate the opportunity to provide comments on this rulemaking. **We strongly support the use of ASHRAE Standard 100-2024 in these Building Energy Performance Standards to help accomplish the state's goals of reducing greenhouse gas emissions and improving energy efficiency.**

ASHRAE stands at the forefront in supplying standards, guidance, and education on the design, manufacturing, installation, and operation of building systems. We are pleased that Oregon is addressing the greatest existing opportunity to reduce energy consumption and carbon emissions by focusing on existing buildings. Currently, the United States has 5.9 million commercial buildings and 124 million residential buildings, which together account for approximately 40% of the nation's total energy use, 70% of its electricity consumption, and 40% of its carbon dioxide emissions. Existing buildings account for approximately 90% of buildings that will exist in ten years, 75% to 80% of buildings that will exist in 2030, and at least 50% of all buildings that will exist in 2050. Additionally, new buildings become existing buildings as soon as they are occupied. Jurisdictions serious about reducing their carbon footprint need a building performance standard that helps them reduce energy consumption and carbon emissions in their existing buildings.

ANSI/ASHRAE/IES Standard 100, *Energy and Emissions Building Performance Standard for Existing Buildings*, is that standard. It provides processes and procedures for reducing energy consumption and carbon emissions through improved energy efficiency and performance of all types of existing buildings, including residential, commercial, institutional, and industrial.

Standard 100 provides owners, utility companies, and government at every level a verifiable process that can reduce energy costs and support tax incentives, rebates, and related programs. It also includes tables to help a jurisdiction determine its Energy Use Intensity (EUI) targets.

In addition to Standard 100, there are also other ASHRAE resources that can assist in this effort:

- Standard 105, Standard Methods for Determining, Expressing and Comparing Building Energy Performance and Greenhouse Gas Emissions
- Standard 211, Standard for Commercial Building Energy Audits
- Standard 228, Standard Method of Evaluating Zero Net Energy and Zero Net Carbon Building Performance
- Proposed Standard 240P, Evaluating Greenhouse Gas (GHG) and Carbon Emissions in Building Design, Construction and Operation
- Multiple technical resource guides developed by ASHRAE's Center of Excellence for Building Decarbonization: <https://www.ashrae.org/about/cebd-center-of-excellence-for-building-decarbonization>

ASHRAE members can offer subject matter expertise to the Department of Energy as the Department implements these BPS requirements. ASHRAE can also provide resources such as technical assistance and training courses throughout the implementation process.

If you have any questions or need additional information, please do not hesitate to contact me or have your staff email GovAffairs@ashrae.org. Thank you for your consideration of this important matter and for working to ensure the health and well-being of building occupants.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is fluid and cursive, with the first name "M." and last name "Knight" clearly legible.

M. Dennis Knight
2024-2025 ASHRAE President