

Tier 2 Compliance

The Building Performance Standard is mandatory for Tier 2 buildings in the state of Oregon. A Tier 2 building is:

- A non-residential building, hotel, or motel with gross floor area of at least 20,000 square feet, excluding any parking garage area, or
- A multifamily, hospital, school, dormitory, or university building with at least 35,000 square feet, excluding any parking garage area.

For Tier 1 covered buildings content, see the [Tier 1 compliance handout](#).

Requirements

- Benchmark the building by measuring and tracking its energy use over a year.

Tier 2 building compliance dates

Compliance dates and submittals for Tier 2 buildings are listed below.

Grossed Floor Area (excluding parking garages)	Building Type	Tier / Compliance Date
20,000 Square feet or greater	Nonresidential, Hotel, or Motel	Tier 2 / July 1, 2028
35,000 Square feet or greater	Multifamily Residential, Hospital, School, Dormitory, University Building	

Tier 2 building owners need to submit the following no later than July 1, 2028, but can submit documents as early as July 1, 2026:

Form A: Application for Oregon BPS Compliance, or
Form G: Grouped Buildings* Application for Oregon BPS Compliance

Form B: Building Activity and Energy Use Intensity Target (EUI_t)

Form C: Calculation of Energy Use Intensity (EUI)

**Grouped Buildings are defined as a collection of all buildings on adjoining property with a single shared primary function that act as a single property, and that share a common energy meter or are connected to the same district heating or cooling system.*

Tier 2 building owners **do not** need to submit an Operations and Management plan (O&M), an Energy Management Plan (EMP), or Form D: Decarbonization Plan (for grouped buildings), and **do not** need to take any action if the building EUI is greater than its EUI_t.

Note: EUI is based on **12 continuous months** of energy use (electricity plus natural gas plus any other fuel use) during the period **no more than 24 months before** the date of the Form C submission.

Is your building exempt?

There are no exemptions for Tier 2 buildings.

Start the compliance process early

This is a process-oriented standard with long lead times to help keep compliance costs down. It is most cost-effective to start the compliance process early. Buildings will need at least one year of data for target compliance.

If you decide to start early, you may be eligible to apply for the [Early Adopter Incentive Program](#).

Learning materials

- The Buildings Performance Standard consists of ASHRAE Standard 100-2024 and state amendments OAR 330-300. Follow the link below to gain access to a copy of the integrated standard published by ASHRAE.
 - [Buildings Performance Standard – Integrated Document \(form\)](#)
- Sign up for the Environmental Protection Agency (EPA) [training series](#) on using Energy Star Portfolio Manager for benchmarking.
- [Subscribe to the BPS distribution list for updates.](#)

Build your team

- Compliance with the standard can get complicated. Plan ahead and understand the supporting roles needed for compliance.
- Tier 2 compliance requires a qualified energy manager.

Benchmark and calculate target

- Benchmarking is required for Tier 2 buildings.
- Create an account with the [Energy Star Portfolio Manager](#) (ESPM).
- Establish the weather normalized energy use intensity (WNEUI) for each building in ESPM.
- Create the energy use intensity target (EUI_t) for the building in accordance with Appendix Y, Section Y6.2 on page 74 of the Building Performance Standard.
- Compare WNEUI to the calculated target (EUI_t). However, Tier 2 covered buildings are not required to meet the target at this time.
- For assistance on how to determine your building's EUI_t within the standard Table 7-2a Building Activity Site Energy Use Intensity Targets on page 97 of the Building

Performance Standard and Table 7-1 Commercial and Residential Types/Activities Table on page 93.

Document compliance through the BPS portal as early as July 1, 2026

The owner of a Tier 2 covered building must report compliance with the standard to ODOE by July 1, 2028, and every five years thereafter.

Benchmarking is required and shall be reported in Tier 2 covered building conditional compliance application. See Appendix Y4 on page 72 of the Building Performance Standard for more details. Application for Tier 2 conditional compliance must be submitted prior to the scheduled compliance date.

Questions?

Contact ODOE at 503-378-4040 | 800-221-8035 or oregonbps@energy.oregon.gov

Learn more: <https://www.oregon.gov/energy/save-energy/Pages/BPS.aspx>