BPS 009 - Grouped Buildings or Campuses

OR BPS Background

The Oregon Building Performance Standard (OR BPS) is a mandatory program that aims to bring awareness about building energy use to owners of existing commercial buildings, and to reduce energy use and utility costs for less efficient buildings. Buildings that must comply with this program are divided into two tiers, based on Gross Floor Area and property type. The table below shows the two tiers covered by the OR BPS program and gives compliance dates.

Oregon Building Performance Standard Tiers

Gross Floor Area *(excludes parking garage area)*	**Property Type**	**Tier / Compliance Date**
35,000 to 90,000 square feet	Nonresidential, Hotel, or Motel	Tier 1 / June 1, 2030
90,000 to 200,000 square feet	Nonresidential, Hotel, or Motel	Tier 1 / June 1, 2029
200,000 square feet and greater	Nonresidential, Hotel, or Motel	Tier 1 / June 1, 2028
20,000 to 35,000 square feet	Nonresidential, Hotel, or Motel	Tier 2 / July 1, 2028
35,000 square feet and greater	Multifamily, Hospital, School, University, Dormitory, Barracks, Prison, Residential/Senior Care Facility	Tier 2 / July 1, 2028

Tier 2 buildings are required to **report Energy Use Intensity and Energy Use Intensity Targets** by their July 1, 2028, compliance date.

Tier 1 buildings are required to **report Energy Use Intensity and Energy Use Intensity Targets** and submit operation & maintenance and energy management plans by their compliance date. They must also **meet EUIt** or demonstrate an effort to **reduce energy use**. Tier 1 buildings that expect to exceed their energy target must report at least **180 days before** their compliance date, perform **energy audits** and **life cycle cost assessments,** and develop a plan to implement **cost-effective energy efficiency measures** by their June 1, 2028/2029/2030, compliance dates.

This guidance describes Grouped Buildings or Campuses and their reporting responsibilities. Additional guidance documents are available on the OR BPS website: https://tinyurl.com/ODOE-BPS.

OR BPS Definitions for Tier 1, Tier 2, and Grouped Buildings

Definitions to understand when determining whether a building must comply with BPS:

Building: a structure, including mobile homes, manufactured homes, and other factory-built buildings, wholly or partially enclosed within exterior walls, or within exterior and party walls and a roof, that affords shelter to people, animals, or property.

Building Owner: an individual or entity possessing title to a building. In the event of a land lease, the building owner is the entity possessing title to the building on leased land. For condominium structures, building owner means the owners' association.

Gross Floor Area (GFA): the space of a building measured from its exterior enclosing walls, not including any parking garage area, but:

- Including all offices, lobbies, restrooms, equipment storage areas, mechanical rooms, break rooms, elevator shafts, and conditioned basements.
- Not including outside bays or docks, exterior spaces, covered walkways, open roofed- over areas, outdoor play courts, porches, exterior terraces or steps, roof overhangs, balconies, decks, patios, pipe trenches, interstitial plenum space between floors, driveways, parking garages, or surface parking areas.
- Including specific areas for each building activity type listed in Table 7-4 of the Oregon Building Performance Standard and the table at the end of this guidance.

Building Gross Floor Area: sum of a building's regular gross floor area and special gross floor area.

Regular Gross Floor Area: sum of a building's gross floor area for hotel, motel, and nonresidential use, excluding any parking garage or special gross floor area.

Special Gross Floor Area: sum of a building's gross floor area for multifamily, hospital, school, university, dormitory, barracks, prison, residential care, and senior care use, excluding any parking garage area.

Tier 1 Building: a building under ownership by a sole individual or entity, with regular gross floor area of at least 35,000 square feet, and that does not meet any Tier 2 building definition.

Tier 2 Building: a building under ownership by a sole individual or entity that is either:

a. a "regular" Tier 2 building with regular gross floor area of at least 20,000 square feet and less than 35,000 square feet, and not a "special" Tier 2 building as in part b. of this definition; or

b. a "special" Tier 2 building with building gross floor area of at least 35,000 square feet and either special gross floor area that equals or exceeds regular gross floor area if regular gross floor area is at least 20,000 square feet, or special gross floor area of at least 15,000 square feet if regular gross floor area is less than 20,000 square feet; or

c. an “extended” Tier 2 building with regular gross floor area that equals or exceeds 35,000 square feet, submitted as part of a set of grouped buildings that includes a “special” Tier 2 building as in part b. of this definition.

Nonresidential Building: as used in this standard, any building not a lodging/residential building type in Table 7-1 of this standard, so not a barracks, hotel, motel, multifamily, prison, dormitory, residential care facility, senior care facility, or other-residential.

Hotel: buildings renting overnight room/suites, typically with bath/shower and other facilities in guest rooms, with daily services for guests including housekeeping/laundry & front desk/concierge. Hotel does not apply if greater than 50 percent of area is fractional ownership units like condominiums, vacation timeshares, or private residences rented on a daily or weekly basis.

Motel: hotel-like lodging where most rooms are entered from the exterior.

Multifamily: a building with five or more dwelling or sleeping units where occupants are primarily permanent in nature and where the occupants do not own the units.

Hospital: a general medical and surgical facility providing acute care services intended to treat patients for short periods of time, including emergency medical care, physician's offices, diagnostic care, ambulatory care, surgical care, and limited specialty services such as children’s hospitals, long-term acute care, inpatient rehabilitation, cancer care, psychiatric care, and substance abuse care.

School: buildings used for educational purposes, including:

- **Adult Education:** buildings used primarily for providing adult students with continuing education, workforce or professional development outside of a college or university.
- **K-12 School**: buildings or campuses used as a school for kindergarten through 12th grade students. At least 75 percent of the students must be in grades K-12.
- **Preschool/Daycare**: buildings used for educational programs or daytime supervision/recreation for young children before they attend Kindergarten.
- **Vocational School:** buildings primarily designed to teach skilled trades, including trade and technical schools. Vocational schools are commonly post-secondary education, consisting of 1-2 years of technical/trade training.
- **Other School:** buildings used for religious, community, or other educational purposes that do not meet the definition of any other type of school.

College/University: buildings used for the purpose of higher education. This includes public and private colleges and universities.

Dormitory: buildings associated with educational institutions or military facilities which offer multiple accommodations for long-term residents, also called a residence hall or barracks.

Barracks: refers to residential buildings associated with military facilities or educational institutions, which offer multiple accommodations for long-term residents.

Prison: federal, state, local, or private-sector buildings used for the detention of persons awaiting trial or convicted of crimes.

Residential Care Facility: provides rehabilitative and restorative care to patients on long-term or permanent basis; can treat mental health issues, substance abuse, and rehabilitation for injury, illness, and disabilities.

Senior Care Community: houses and provides care and assistance for elderly residents.

Grouped Buildings: a set of Tier 1 and/or Tier 2 buildings that comply at the connected or campus-level, or that comply at the complex level and have a single shared primary function, along with any other connected buildings that are not covered buildings.
Complex: a group of individual or connected buildings on contiguous property.

Connected Buildings: buildings with shared energy meter(s) on contiguous property.

Contiguous Property: adjoining property sharing a common border under sole ownership.

Campus: collection of buildings served by district heating, cooling, water reuse, and/or a power system owned by the same building owner.

OR BPS Definitions for Energy Calculations

Before calculating energy use intensity or energy use intensity target, terms to understand:

Building Activity Type: classification for the function or business that takes place within a building. There are 113 different building activity types in BPS corresponding to property types in U.S. EPA ENERGY STAR Portfolio Manager.

Net Energy Use: the sum of metered and bulk fuel energy that enters a building minus the sum of metered energy that leaves the building, including all fuels used or generated in the building, most commonly:

- Electricity, natural gas, fuel oil, and propane use.
- Steam, hot water, or chilled water use from district heating and cooling systems.
- Electricity generated from renewable sources.

Energy Use Intensity (EUI): a measurement of energy use that normalizes building energy use relative to building size, calculated by dividing the total net energy the building consumes in one year by the building gross floor area, reported in units of thousands of British thermal units per square foot per year (kBtu/ft^2-yr).

Energy Use Intensity Target (EUIt): EUI value established for compliance with this standard as the maximum total energy use buildings are expected to consume in a year. EUIt values were set for Oregon buildings by analyzing local, regional, and national commercial buildings and applying average weather-normalized energy use to different building activity types.

Operating Factor: aka the Building Operating Shifts Normalization Factor from BPS, used as a multiplier on EUIt for each building activity type. Operating factors vary between 0.5 and 1.9 in value based on the building activity type and weekly operating hours of the building, with different factors for buildings with 0 to 50 hours, 51 to 167 hours, and 168 hours.

Weather Normalized Energy Use Intensity (WN-EUI): a measurement of energy use that normalizes building energy use relative to building size and corrects for deviations in weather from typical weather at the building location, reported in units of a thousand British thermal units per square foot per year (kBtu/ft^2-yr).

Form G: Grouped Buildings Application for OR BPS Compliance

As defined above for the BPS program, Grouped Buildings are buildings that comply at the complex, connected or campus-level. Instead of submitting separate application forms for each building (***Form A: Application for Oregon BPS Compliance***), they can submit a single application (***Form G: Grouped Buildings Application for Oregon BPS Compliance)***.

There are four considerations to think through before deciding whether to submit a *Form G* application for a set of Grouped Buildings:

1) Does the group include any buildings that would qualify as Tier 1 or Tier 2 individually? If not, based on the table below, the entire group is Not Covered and no further BPS work needs to be done.

Gross Floor Area *(excludes parking garage area)*	**Property Type**	**Tier / Compliance Date**
less than 20,000 square feet	Nonresidential, Hotel, or Motel	NOT COVERED
less than 35,000 square feet	Multifamily, Hospital, School, Dormitory, University; also Prison, Residential/Senior Care Facility	NOT COVERED
35,000 to 90,000 square feet	Nonresidential, Hotel, or Motel	Tier 1 / June 1, 2030
90,000 to 200,000 square feet	Nonresidential, Hotel, or Motel	Tier 1 / June 1, 2029
200,000 square feet and greater	Nonresidential, Hotel, or Motel	Tier 1 / June 1, 2028
20,000 to 35,000 square feet	Nonresidential, Hotel, or Motel	Tier 2 / July 1, 2028
35,000 square feet and greater	Multifamily, Hospital, School, University, Dormitory, Barracks, Prison, Residential/Senior Care Facility	Tier 2 / July 1, 2028

2) **Does the group include buildings with shared energy metering?** If so, and if the group includes any Tier 1 or Tier 2 buildings, then a ***Form G*** application for a set of Grouped Buildings must be used.

3) **Are there any special Tier 2 buildings in the group?** If there are any multifamily, hospital, school, dormitory, university, prison, barracks or residential/senior care buildings in the group with at least 35,000 SF of GFA ("special" under the Tier 2 definition), it may be beneficial to apply as a group using ***Form G.*** Even if their metering

isn't shared, Tier 1 buildings in a group with a "special" Tier 2 building may have Tier 2 status extended to them if the buildings share the same primary function. (see part c. "extended" under the Tier 2 definition).

Before moving to the fourth consideration, some examples are reviewed:

- A set of four office buildings has 15,000 square feet each of Gross Floor Area, with shared electricity metering. Even though the square footage of all four buildings totals 60,000 square feet, each of those office buildings are individually not covered by BPS since each is smaller than 20,000 square feet. This makes the entire group not covered as well, so they need not comply with BPS.
- Two office buildings of 40,000 square feet share a natural gas meter. If the buildings' metering were entirely separate, each building could apply for BPS individually as Tier 1 buildings using **Form A**. Since their energy use cannot be disentangled, they must apply to BPS as Grouped Buildings using **Form G**. The group includes two Tier 1 buildings and has a compliance date of June 1, 2030.
- A retail complex of four buildings includes a 100,000 square foot strip mall with multiple shops, plus three standalone buildings with 40,000, 30,000, and 15,000 square feet of gross floor area. There is a single electricity meter for all four buildings. Since their energy use cannot be disentangled, they must apply as a group using ***Form G***. This group includes two Tier 1 buildings, one Tier 2 building, and one building that is not covered but is included by default. The compliance date for this group is June 1, 2029.
- Ten buildings on a university campus are on a shared district system that distributes steam for heating to each of these buildings, with no individual steam metering. The buildings range in size from a 10,000 gross square foot dormitory to a 250,000 square foot department administration and classroom building. Since these are university buildings, any buildings of at least 35,000 square feet may qualify as "special" Tier 2 buildings with a compliance date of July 1, 2028. The whole set of buildings would apply to BPS as Grouped Buildings using **Form G.**
- A hospital complex has six buildings, including the 250,000 square foot hospital itself, two 100,000 square foot medical office buildings, a 30,000 square foot cafeteria with some retail space, a 30,000 square foot lodge for patient families, and a 10,000 square foot building housing the district heating system. The hospital qualifies as a "special" Tier 2 building. The medical office buildings would be Tier 1 buildings if they each applied for BPS as a Single Building, but since they're part of a grouped submission as a hospital complex they receive "extended" Tier 2 status. The cafeteria/retail building retains its Tier 2 status, and the heating system building is not covered, but must be

included by default because it shares metering with the rest of the group.

There is one more point to consider before applying as a set of Grouped Buildings:

1) **Should submetering be installed to allow buildings to be treated separately as a Single Building under BPS?** Depending on the situation, installing submeters could make it easier to comply with BPS and be beneficial for various other reasons.

Below is an example of the potential benefits of submetering when complying with BPS:

- Revisiting the two 40,000 square foot office buildings with shared gas metering example from above, imagine that analysis of the total energy use for both buildings shows that they collectively do not meet their energy target. This means that both buildings would need to perform Energy Audits and install Energy Efficiency Measures (EEMs).

  If submetering were installed, separate energy data might show that one building meets its target while the other does not. This means that one building would not need to do Energy Audit and EEM installation work, and the required audit can focus on the more problematic building. The energy metering also serves as a more useful diagnostic for the buildings.

Installation of submetering can reveal whether individual Tier 1 buildings meet energy targets. Even if it is found that separately metered buildings still don't meet their energy targets, building-specific metering can help diagnose underlying energy problems. Separate metering also allows tracking to identify energy problems that occur in the future.

Tier 2 buildings can also benefit from submetering. Energy metering can foster energy awareness and spur voluntary improvements to reduce energy use, decrease energy expenditures, and improve building comfort.

Energy submetering can also be used to substantiate or improve tenant energy billing. Total utility bills are often divided amongst tenants based on the amount of square footage they lease instead of on the actual energy they use. Some tenants may have higher energy use than others. Getting information about and being billed on actual energy use can raise awareness and prompt energy conservation efforts by tenants.

Note that if submetering is to be installed and used for BPS compliance, it should be installed as soon as possible. Energy use intensity of buildings is calculated based on any 12 months of continuous energy data collected in the 24 months before an application is submitted. If a building is not likely to meet its energy target, the BPS application must be submitted at least 180 days before the building compliance date. This means that any submetering should be installed and operational for *at least* 18 months, and ideally at least 30 months, before that building's compliance date.

Form G Submissions for Grouped Buildings

Form G: Grouped Building Application for Oregon BPS Compliance should be submitted by the earliest compliance date for any of the Tier 1 and Tier 2 buildings in the group, or 180 days prior to that compliance date if the group does not meet its energy target.

Note that a Qualified Person should fill out **Form G** if the Grouped Buildings include any Tier 1 buildings, and either a Qualified Energy Manager or Qualified Person fills out **Form G** if the group only includes Tier 2 buildings.

Grouped Buildings Energy Use Intensity Target (EUIt)

To find the Energy Use Intensity Target (EUIt) for Grouped Buildings, follow the procedures outlined in the **BPS 003 – Finding EUI Target** guidance with some adjustments.

At the discretion of the Qualified Person (Tier 1 buildings) or Qualified Energy Manager (Tier 2 buildings), **Single buildings** may be subdivided by area or months of the year when finding their energy target. **Grouped Buildings** should not be subdivided below the building level, but can be subdivided by months of the year. The BPS EUI Target Tool is used find the group EUIt as follows:

- Determine the GFA, activity type and weekly operating hours for *each building*.
- Buildings may be assigned different activity type and operating hours over months of the year if there are seasonal changes in operation (schools should not enter seasonal changes since these are already factored into their energy target values).
- EUIt values are assigned for *each building* based on its activity type.
- Operating Factors are assigned for *each building* based on its activity type and weekly operating hours.
- EUIt is multiplied by Operating Factor to get *each building's* EUIt.
- An area-weighted and/or time-weighted average is made of *all buildings* to find the overall group EUIt.

If one of the Grouped Buildings has a Nontarget building activity type, meaning that no EUIt value has been assigned to it, then the Nontarget building's EUIt is set equal to the overall EUIt for the rest of the group. There are only three building activity types without EUIt values:

- 100: Technology / science | Data center | NONTARGET
- 108: Utility | Energy / power station | NONTARGET

- 109: Utility | Other - utility | NONTARGET

It can be helpful to install submetering on Nontarget buildings, since it could then be dropped from the Grouped Building analysis. However, a Nontarget building would still need to comply individually with BPS if it is classified as Tier 1 or Tier 2 building.

The Energy Use Intensity Target (EUIt) for a set of Grouped Buildings is still reported on **Form B: Building Activity and Energy Use Intensity Target (EUIt)**, using the UBID for the largest Tier 1 or Tier 2 building as the group ID. Note that a Qualified Person should find EUIt and fill out **Form B** if the Grouped Buildings include any Tier 1 buildings, and either a Qualified Energy Manager or Qualified Person finds EUIt and fills out **Form B** if the group includes only Tier 2 buildings.

See BPS 003 – Finding EUI Target for more information.

Grouped Buildings Energy Use Intensity (EUI)

To find the Energy Use Intensity (EUI) for Grouped Buildings, follow the procedures outlined in the BPS 004 – Calculating EUI guidance for individual buildings.

Sum up the net energy use for all buildings in the group to calculate the group's overall EUI. For example, a set of Grouped Buildings may only share metering for its district heating system, but still have separate electrical energy use metering. The total gross square footage for all the group's buildings should also be used to calculate the group's overall EUI.

Follow the provisions within ENERGY STAR Portfolio Manager (ESPM) to include multiple buildings in calculation of overall EUI and WN-EUI values for a set of Grouped Buildings.

The Energy Use Intensity (EUI) for a set of Grouped Buildings is still reported on **Form C: Calculating Energy Use Intensity Target (EUI)**, using the UBID for the largest Tier 1 or Tier 2 building as the group ID.

Note that a Qualified Person should find EUI and fill out **Form C** if the Grouped Buildings include any Tier 1 buildings, and either a Qualified Energy Manager or Qualified Person finds EUI and fills out ***Form C*** if the group includes only Tier 2 buildings.

See BPS 004 – Calculating EUI for more information.

Grouped Buildings O&M, EMP, and Decarbonization Plan Reporting

If any **Tier 1 buildings** are in the set of Grouped Buildings, the building owner and Qualified Person are required to attest that these programs and plans are being followed:

- **Operations and Maintenance (O&M)** program information, detailing the normal operating schedules and settings of any Tier 1 building's equipment, and the schedule for routine maintenance, testing, and replacement of equipment.
- **Energy Management Plan (EMP)** for any Tier 1 buildings that lays out how energy use and emissions are monitored and tracked. It should also list the major energy-using systems in the building and how much energy they use.
- It also compiles energy audit results and schedules for EEM implementation, including expected expenditures for energy use and equipment. It should also include a list of all building personnel and their training, and a list of suppliers of HVAC, lighting, and other energy-using equipment.
- **Form D: Decarbonization Plan** is for Tier 1 buildings that are part of a **district heating and cooling system** serving at least three buildings with at least 100,000 total square feet of conditioned space. The plan outlines the strategy undertaken to reduce or eliminate the use of fossil fuels serving the district system. All campuses with district systems must notify ODOE they are preparing a Decarbonization Plan by June 30, 2026, file that plan by June 20, 2027, and submit progress reports every five years thereafter.

See BPS 007 – Operations and Maintenance Programs, BPS 008 – Energy Management Plans, and BPS 012 – Decarbonization Plans.

Form E: Energy Audit

If a set of Grouped Buildings exceeds its energy target (EUI is greater than EUIt), then any Tier 1 buildings within that group may need to perform an Energy Audit. This audit does not need to focus on any Tier 2 or non-classified buildings in the Group.

An audit includes reviewing a building's major systems to look for energy inefficiencies and opportunities for improvement. The systems to review include HVAC, lighting, service hot water heating, building envelope, internal building loads, and any large energy using equipment.

A Qualified Energy Auditor (QEA) must be engaged to perform Energy Audits for BPS compliance. A list of auditors with the proper credentials, certifications, experience, and training is provided on the BPS website. The Qualified Energy Auditor should be assisted by the

Qualified Person and building owner.

For Tier 1 buildings not meeting their energy target, the Energy Audit must be performed and the **Form E: Energy Audit** report must be submitted **before the compliance date**. Note that a **Form G** program application should have already been submitted for the Grouped Buildings at least 180 days before the compliance date noting that the buildings were not going to meet their collective energy target.

The main output from an Energy Audit is a list of recommended cost-effective energy efficiency measures (EEMs). To be "cost-effective," an EEM is expected to pay for itself over its lifetime by saving money on utility bills and maintenance costs. Many EEMs resulting from energy audits are "no-cost" or "low-cost" items, simple tweaks to building operations or inexpensive repairs to equipment. Other EEMs may involve the replacement of old, inefficient equipment that was already near the end of its life. Energy audits under the BPS are geared toward finding the most practical and affordable energy efficiency improvements to buildings.

Auditors should use the free, online **Audit Template** tool to collect and analyze building information. Output from this tool serves as the **Form E: Energy Audit** report that is submitted to the BPS program **before the compliance date for the largest building in the group**.
A single **Form E** can be used for all Tier 1 buildings in the group as long as EEMs are delineated for each building.

Note that a **Form G** program application should have been submitted for any set of Grouped Buildings at least 180 days before the compliance date.

See BPS 005 – Energy Audits and LCCAs and BPS 006 – Energy Professionals

Form L: Life Cycle Cost Assessment (LCCA)

If a set of Grouped Buildings exceeds its energy target (EUI is greater than EUIt), and an Energy Audit is performed for any Tier 1 buildings in that group, an optional Life Cycle Cost Assessment (LCCA) can also be performed. As with the energy audit, the LCCA does not need to focus on any Tier 2 or non-classified buildings in the Group.

An LCCA is a more in-depth look at the financial aspects of EEMs that were recommended by the Energy Audit. It includes costs and savings associated with capital expenditures, labor for design, installation and commissioning of EEMs, utility bill savings, financing fees, tax credits, equipment rebates, and maintenance expenses over the lifetime of an EEM. This extra analysis can refine the list of EEMs from the Energy Audit into a package of upgrades that is best suited

to a building's condition and financial situation.

This assessment can also help the building owner and Qualified Person decide how to stage building improvements over time. The LCCA can consider the age and condition of existing equipment, potential savings of EEMs, and the availability of capital, to develop an attainable schedule for EEM implementation.

Like the Energy Audit, an LCCA should be performed by a Qualified Energy Auditor (QEA). BPS expects to require use of a particular LCCA tool that is compliant with NIST Handbook 135 and capable of supporting the evaluation criteria required by Normative Appendix X.

For Tier 1 buildings not meeting their energy target, the LCCA must be performed and the **Form L: Life Cycle Cost Assessment (LCCA)** must be submitted **before the compliance date for the largest building in the group**. A single **Form L** can be used for all Tier 1 buildings in the group, using the UBID for the largest Tier 1 building, with EEMs delineated for each building.

Note that a ***Form G*** program application should have been submitted for the set of Grouped Buildings at least 180 days before the compliance date.

See BPS 005 – Energy Audits and LCCAs and *BPS 006 – Energy Professionals*.

Energy Efficiency Measure Implementation and Reporting

If a set of Grouped Buildings does not meet its energy target (EUI is greater than EUIt), then Energy Efficiency Measures (EEMs) likely need to be implemented in any Tier 1 buildings in that group. This means either tackling the list of cost-effective EEMs from Tier 1 building Energy Audits, or phasing work on a package of EEMs from the Life Cycle Cost Assessment over time.

To reap the most benefits from the BPS program, building owners should try to implement EEMs promptly. This helps buildings to accrue energy and utility bill savings as soon as possible and enables buildings to reach BPS compliance.

Ideally, EEMs in any Tier 1 buildings are installed before their building compliance date. If Tier 1 building EEMs can be installed early enough, the set of Grouped Buildings may be able to reach its energy target before the compliance date. This means it would be able to demonstrate compliance, forego submitting **Form E** or **Form L**, and not need to submit annual follow up reports to track progress on EEM implementation and building energy performance.

Grouped Buildings that do not expect to meet their energy target by the compliance date can choose one of three ways to comply with BPS:

- Conditional Compliance – Energy Efficiency Measures from the Energy Audit or Life Cycle Cost Assessment have been implemented by the compliance date and the building **IS** expected to reach its energy target, but more time is needed to collect energy data for confirmation.
- Investment Criteria – Energy Efficiency Measures from the Energy Audit and Life Cycle Cost Assessment have been implemented by the compliance date, but the building is **NOT** expected to reach its energy target, or Energy Use Intensity cannot be determined due to unavailability of energy data.
- Investment Criteria through Conditional Compliance – Energy Efficiency Measures from the Energy Audit and Life Cycle Cost Assessment are **NOT** implemented before the compliance date but are being phased in over time.

For Grouped Buildings with shared metering, the energy use of Tier 1 buildings can only be estimated to be some percentage of the total energy use. Projected savings from EEM implementation are also less definitive, and energy savings from EEMs in just the Tier 1 buildings may not be enough for the entire set of Grouped Buildings to reach their energy target. It is therefore more likely for a set of Grouped Buildings to choose to follow one of the Investment Criteria paths to compliance.

For all three compliance paths, Annual Reporting to document EEM implementation and progress in reducing Energy Use Intensity (EUI) is required via **Form G** and **Form C**, reporting on the group level under the UBID of the largest Tier 1 building. When, or if, the set of Grouped Buildings reach their energy target, Completion Reporting can also be submitted via **Form G** and **Form C** on a group level to demonstrate BPS compliance.