



Shaping Tomorrow's  
Built Environment Today

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M. Dennis Knight  
2024-2025 ASHRAE President

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October 8, 2024

Mark Stewart  
Program Manager  
Climate Change Program  
Air and Radiation Administration  
Maryland Department of the Environment  
1800 Washington Boulevard, Suite 705  
Baltimore, MD 21230-1720

RE: 24-079-P-I, Notice of Proposed Action

Sent via email to: [BEPS.MDE@maryland.gov](mailto:BEPS.MDE@maryland.gov)

Dear Mr. Stewart:

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 900 in Maryland, 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. **ASHRAE supports the establishment of building benchmarking policies and Building Energy Performance Standards, and recommends using ASHRAE standards and resources to help accomplish this regulation's goals of reducing greenhouse gas emissions and improving energy efficiency in Maryland's buildings.**

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 Maryland 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.

Additional ASHRAE resources that are relevant to BEPS and building benchmarking include:

- 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>

In addition, ASHRAE members can offer subject matter expertise to the Department of the Environment as the Department implements these BEPS 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](mailto: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,



M. Dennis Knight  
2024-2025 ASHRAE President