

June 9, 2026

**To:** Members of the Climate, City Services & Infrastructure Committee  
**From:** Sheryl M.M. Long, City Manager 202601935  
**Subject:** **Summary of Community Feedback on Energy Performance in Large Buildings**

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### REFERENCE DOCUMENT #202501915

The Council, at its session on October 29, 2025, referred the following motion for report:

**WE MOVE** that the City Administration prepare a report within the next 30 days stating the findings of the four engagement sessions that have occurred from June 27th, July 29th, August 26th, and September 30th regarding the ideation of a Building Performance Standards Policy for the City of Cincinnati.

**FURTHER WE MOVE** that the administration provides findings specific to the conversations around the following parts of the ideation process: scope, targets, metrics, timeframes, alternative compliance pathways (ACPs), and more. After these findings are stated, we request that recommendations of all of the previously stated items be made to Council.

**FURTHER WE MOVE** that the administration prepare an accompanying presentation with this report to share with stakeholders to discuss possible policy recommendations and the findings of the public engagement sessions.

The purpose of this report is to provide City Council with a summary of the community feedback collected as part of the Resilient and Efficient Codes Implementation (RECI) grant. The US Department of Energy grant was awarded to the University of Cincinnati to support exploration of policies to improve energy performance in large buildings in Ohio cities, including Cincinnati, Cleveland, Columbus, and Dayton.

### **OVERVIEW OF ENERGY PERFORMANCE STRATEGIES IN LARGE BUILDINGS**

In May of 2023, City Council adopted the Green Cincinnati Plan (GCP) and a commitment to carbon neutrality by 2050. Recognizing that approximately 30% of emissions come from commercial building operations, the GCP includes the strategic priority action: *“Improve building performance by implementing policies like benchmarking, building performance standards, or other relevant energy standards.”*<sup>1</sup>

Many cities, counties, and states across the country have implemented energy policies like energy benchmarking and building performance standards (BPS) to reduce energy consumption, lower energy bills for owners and tenants, and improve the desirability of the local building stock.

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<sup>1</sup> 2023 Green Cincinnati Plan, page 63.

**Energy benchmarking**<sup>2</sup> refers to the practice of measuring the energy performance of a building over time. This provides owners and occupants with the ability to understand their building's energy performance relative to similar buildings and evaluate smarter, more cost-effective operational and capital investment options. Studies have shown that benchmarking policies can result in a 3 - 8% reduction in gross energy usage over a four-year period.<sup>3</sup> Midwest cities with benchmarking ordinances include Columbus, Detroit, St. Louis, Minneapolis, and Milwaukee.

**Building Performance Standards (BPS)** are a policy that requires existing buildings to meet a stated energy use target by a specified date. BPS uses building utility data to track compliance with the targets. While the policy specifies a target that buildings must meet, it does not prescribe the steps building owners must take to meet it. BPS often get more ambitious over time to ensure continuous improvement of a city's building stock. Studies have shown that BPS policies can lead to a 25-45% total energy use reduction in aggregate.<sup>4,5</sup> St. Louis, MO and Evanston, IL are two Midwest cities that are successfully implementing BPS.

## **SUMMARY OF STAKEHOLDER FEEDBACK AND RECOMMENDATIONS**

Starting in June 2025, a team led by Dr. Amanda Webb of the University of Cincinnati conducted four stakeholder engagement sessions to explore how large building energy policies could be implemented in Ohio.<sup>6</sup> Over 50 individuals from the buildings and energy sector, including design professionals, engineering firms, and building representatives participated. Each stakeholder meeting provided an opportunity for participants to provide feedback on different components of building energy policies. The table below provides a summary of the policy components, stakeholder feedback, and key takeaways from the meetings.

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<sup>2</sup> See Council Item 202401247 for additional information on energy benchmarking.

<sup>3</sup> N. Mims, S. R. Schiller, E. Stuart, L. Schwartz, C. Kramer, and R. Faes, "Evaluation of U.S. Building Energy Benchmarking and Transparency Programs: Attributes, Impacts, and Best Practices," Lawrence Berkeley National Lab. 2017. <https://doi.org/10.2172/1393621>.

<sup>4</sup> A.L. Webb, C. McConnell, Evaluating the feasibility of achieving building performance standards targets, Energy and Buildings. (2023) 112989. <https://doi.org/10.1016/j.enbuild.2023.112989>.

<sup>5</sup> S. Nadel and A. Hinge, "Mandatory building performance standards: A key policy for achieving climate goals," ACEEE, 2020. <https://www.aceee.org/white-paper/2020/06/mandatory-building-performance-standards-key-policy-achieving-climate-goals>.

<sup>6</sup> Partners included the Ohio Environmental Council, Cincinnati 2030 District, Power a Clean Future Ohio, Midwest Energy Efficiency Alliance, Go Sustainable Energy

## Summary of Stakeholder Engagement Feedback on Building Energy Policies

Policy Component	Stakeholder Feedback	Key Takeaways
<b>1. Scope:</b> The type, size, and use of buildings included in energy policies.	Focusing on the largest buildings would deliver the largest benefit with minimal administration. Buildings larger than 50,000 square feet represent 0.7% of the city's building stock but account for 45% of total building emissions.	A building energy policy could include commercial buildings, including multi-family buildings, over 100,000 square feet and all City buildings over 10,000 square feet.
<b>2. Energy Benchmarking:</b> Buildings that are included in the scope report energy usage on an annual basis.	Reporting annual energy usage is a foundational component for other building energy policies.	A benchmarking policy is a good introductory step to building energy policies.
<b>3. Metric:</b> Refers to the unit used to measure performance relative to building energy policies.	Site Energy Usage Intensity is a widely used metric. Reduction in energy usage should be the goal of building energy policies. Using greenhouse gas emissions is complicated.	A technical committee could determine if energy usage reduction or another metric is the best way to measure performance.
<b>4. Timeframe:</b> The period against which compliance with building energy policies is measured.	The timeframe should provide a sufficient runway for buildings to achieve the targets.	A technical committee could determine if a five-year compliance cycle is appropriate for an advanced building energy policy.
<b>5. Performance Targets:</b> Establish the stringency of the performance metrics that buildings must meet.	Targets must be set so they are achievable and account for past upgrades.	A technical committee could establish performance targets during a rulemaking process.
<b>6. Alternative Compliance Pathways:</b> Provide a way for buildings to comply with building energy policies outside of meeting the performance targets.	The policies should be straightforward and feasible enough that the use of ACPs is the exception, not the rule.	A technical committee could determine alternative compliance pathways during the rulemaking process.
<b>7. Incentives:</b> Tools used by building energy programs to help buildings to achieve performance targets.	Incentives, including free or subsidized energy audits, are critical to success.	A technical committee could work with City departments to identify programs that could be created and propose ideas for how existing programs can be enhanced.
<b>8. Compliance and Enforcement:</b> Tools to ensure that building owners work toward the targets established by building energy policies.	The policy should encourage compliance rather than rely on enforcement.	A technical committee could collect stakeholder feedback and propose enforcement mechanisms.
<b>9. Program Resources:</b> Resources provided by jurisdictions to help building owners meet building energy policies.	Building managers need access to resources to improve the operation of their buildings.	A building energy policy could include funding in future budgets to support policy implementation.

## POTENTIAL NEXT STEPS

Based on stakeholder feedback, there are three steps that Council could consider to advance building energy policies:

1. **Energy benchmarking ordinance** – This ordinance would establish a mandatory benchmarking program for commercial buildings, including multi-family buildings, over 100,000 square feet and all City buildings over 10,000 square feet. These buildings would be responsible for reporting their energy use on an annual basis.
2. **Establish a technical committee to identify the components of future building energy policies** - The technical committee would leverage its knowledge as well as feedback from building sector stakeholders to develop the components of a building energy policy. It would be responsible for presenting its recommendations to Council within an established time frame.
3. **Building Energy ordinance** – This ordinance would incorporate the recommendations from the technical committee and stakeholders to pass a building energy policy for Cincinnati.

## ADDITIONAL INFORMATION ON RESEARCH, STAKEHOLDER ENGAGEMENT & KEY TAKEAWAYS

The University of Cincinnati (UC) as well as several state and regional organizations worked with the Office of Environment & Sustainability (OES) to conduct four stakeholder engagement sessions over the course of Summer 2025. Over 50 individuals from the buildings and energy sector, including design professionals, engineering firms, and building representatives, participated in one or more sessions. Each meeting focused on a specific topic and included educational components and group activities designed to collect feedback from participants. A summary of each meeting is provided below.

- **Meeting 1 (6/27/25):** Provided an overview of the city's emissions profile and discussed how improved building performance can help Cincinnati meet its climate goals. Reviewed the policy elements of a building energy policy (scope, metric, targets, and timeframe)<sup>7</sup> and collected feedback from participants on building energy policies and discussion topics for future meetings.
- **Meeting 2 (7/29/25):** Reviewed building data for Cincinnati and discussed how it can inform the building energy policy elements of scope, metric, targets, and timeframe. Participants broke into small groups to workshop ideas for these four building energy policy elements and shared their ideas to identify common themes.
- **Meeting 3 (8/26/25):** Reviewed existing finance, grant, and incentive programs available to building owners that could assist with the cost of energy audits and building improvements needed to comply with a building energy policy. Participants

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<sup>7</sup> ASHRAE. 2023. Building Performance Standards: A Technical Resource Guide. ASHRAE. <https://www.ashrae.org/about/cebd-technical-resources>.

discussed ideas for incentive programs that could be developed or enhanced to support policies.

- **Meeting 4 (9/30/25):** Discussed Alternative Compliance Pathways (ACPs), reviewed examples from other cities, and identified ways that ACPs can create flexibility and increase compliance with building energy policies.<sup>8</sup> Reviewed enforcement mechanisms used in other jurisdictions and the benefits provided by technical support resources. Participants discussed the compliance and enforcement features needed for successful policy implementation.

## **Research Findings**

Dr. Amanda Webb and her team at UC analyzed commercial building energy data to simulate scenarios that allow for development of a building energy policy model specific to Cincinnati.

The initial scenario looked at the impacts of including all commercial, government, and multifamily buildings greater than 100,000 square feet in a policy. In each subsequent scenario, one policy element (scope, metric, targets, or timeframe) was changed to model the resulting number of buildings impacted and projected emissions savings.

Key findings from the scenario modeling research are:

- Applying a building energy policy to buildings over 100,000 square feet maximizes the emissions savings while minimizing the number of buildings subject to the policy.
- Including properties over 50,000 square feet doubles the number of properties requiring improvement but only leads to 1% more overall emissions savings compared to the baseline.
- Including a carbon-free electricity metric or ACP presents the best opportunity for emissions reduction.
- Setting the site Energy Use Intensity (EUI) performance target between the 25<sup>th</sup> and 50<sup>th</sup> percentiles would establish an achievable target and maximize emissions savings.

The research findings were used to inform stakeholder discussions during the engagement sessions.

## **Stakeholder Feedback and Recommendations**

Each stakeholder meeting provided an opportunity for participants to provide feedback on different components of a building energy policy. This section defines the policy elements discussed, summarizes the stakeholder conversations, and provides recommendation based on the stakeholder feedback.

### **1. Scope**

Defines the types of buildings covered by a building energy policy. It can be based on building size or use.

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<sup>8</sup> M. Duer-Balkind, M. Koolbeck, C. Kelley, The Landscape of Building Performance Standard Pathway Alternatives, Institute for Market Transformation, 2025.  
<https://imt.org/resources/the-landscape-of-building-performance-standard-pathway-alternatives/>.

Stakeholders provided the following feedback during the engagement sessions:

- Initial roll out of a policy may be more successful if it starts with fewer buildings and expands to include additional building sizes in future compliance cycles.
- Buildings larger than 50,000 square feet represent 0.7% of the city's building stock but account for 45% of total building emissions. Focusing on the largest buildings would impact a substantial portion of emissions with a relatively small compliance burden.
- Small commercial buildings use a lot of energy as well but are typically not included initially in a policy.
- Industrial buildings should be excluded from the initial policy because their energy profiles cannot be tracked or compared in the same manner as commercial building types.
- State and federal buildings should be exempt from the policy.

**Key Takeaway:** The policy could consider including commercial buildings, including multi-family buildings, over 100,000 square feet and all City buildings over 10,000 square feet. Buildings over 50,000 square feet could be added to the policy in the future. Buildings that Council should consider for exclusion from a policy include federal government buildings, buildings currently in receivership or default, and industrial buildings.

## **2. Benchmarking**

A building energy policy that requires buildings identified in the Scope to report energy usage on an annual basis.

Stakeholders provided the following feedback during the engagement sessions:

- Benchmarking can be a good introduction to building energy policies.
- Annual energy usage can be used to help establish a baseline for future policies.
- Benchmarking can help lead to energy efficiency improvements as building owners begin to monitor usage patterns.

**Key Takeaways:** A benchmarking policy helps introduce building energy policies to local building owners. It encourages building owners to monitor their energy usage which can lead to energy efficiency improvements that benefit tenants and support the local economy.

## **3. Metric**

Defines the unit used to measure performance relative to the building energy policy.

Stakeholders provided the following feedback during the engagement sessions:

- **Site Energy Usage Intensity (EUI)** – This metric is determined by dividing the total amount of energy used annually by the building's square footage (but/sq ft). It is a common metric and is calculated by ENERGY STAR Portfolio Manager, a free and widely used building energy benchmarking tool. Site EUI can be compared to local and national buildings of the same building type.<sup>9</sup> Participants were in favor of using this metric because it is easy to calculate and familiar to many building owners and managers.

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<sup>9</sup> [Property Types available in ENERGY STAR Portfolio Manager](#)

- **Greenhouse Gas Emissions (GHG) Intensity** – Calculated by multiplying the amount of each energy source a building uses by an emissions factor to determine total GHG emissions. Participants felt that calculating GHG emissions is complicated and not transparent.
- **Reduction in Energy Usage** – Calculated by determining the amount of energy reduction performed by a building relative to its current performance (or a baseline period). Participants expressed that reducing the amount of energy used by buildings should be the goal of a policy.
- **Percentage of carbon-free electricity used** – Determined by calculating the percentage of the total energy used by a building that is either purchased from carbon-free sources or offset by the purchase of Renewable Energy Credits (RECs). Participants felt that this metric encourages buildings to purchase carbon-free electricity and would help meet the goals outlined in the GCP.

**Key Takeaway:** A Council-appointed technical committee could develop the appropriate metric for a building energy policy. Reduction in energy usage could be considered as the metric for a local building energy policy. This metric received support during the stakeholder engagement process and is familiar to building managers and the public. Buildings would be measured based on their performance and not relative to the performance of other buildings.

#### **4. Timeframe**

Defines the period against which compliance with the building energy policy is measured.

Stakeholders provided the following feedback during the engagement sessions:

- The timeframe should provide a sufficient runway for buildings to achieve the targets.
- Participants were supportive of a four-year benchmarking period with a compliance period in year five.
- BPS compliance cycles should align with GCP update cycles if possible.

**Key Takeaway:** A Council-appointed technical committee could identify the timeline for a building energy policy. The policy could utilize a five-year compliance period. This would require a building to benchmark its energy usage for four years to track progress towards the standard. The building's reported energy use in year five would determine its compliance with the policy.

#### **5. Performance Targets**

Establish the stringency of the performance metrics that buildings must meet under a building energy policy. For Site EUI, this is a percentile by building type, and for energy reduction and carbon-free electricity, this is a percentage. Adjusting targets up or down impacts the stringency of the policy and its subsequent compliance rates. They can take two different forms:

- **Fixed targets** – Provide a final goal for buildings to achieve, such as the City's goal of carbon neutrality by 2050. Interim targets are set in the initial policy for each compliance period to ensure a building's progress towards the final goal.
- **Recalculated targets** – Provide a final goal for buildings to achieve, such as the City's goal of carbon neutrality by 2050, but do not set interim goals in the initial policy.

Instead, the interim targets are recalculated after each compliance period to provide flexibility while still pushing buildings towards the final goal.

Stakeholders provided the following feedback during the engagement sessions:

- The clarity of a fixed long-term goal aligns with capital cycles.
- Fixed interim targets help with long- and short-term planning.
- There is a need to strike balance between iteration and market certainty.
- Targets must be set so they are achievable and account for past upgrades.
- Recalculated targets offer more flexibility and the ability to adjust future targets based on data.

**Key Takeaway:** A Council-appointed technical committee could develop targets for a building energy policy. The committee would analyze data and collect stakeholder feedback to determine whether to use fixed or recalculated interim targets and to establish final targets that will help the City achieve its goal of carbon neutrality by 2050. While a portion of multi-family and historic commercial buildings may have difficulty meeting targets, Alternative Compliance Pathways can be designed to provide a way for them to demonstrate compliance with the policy.

## **6. Alternative Compliance Pathways (ACPs)**

Provide a way for buildings to comply with the standard outside of meeting the performance targets and play a critical role in the success of a building energy policy. They recognize that factors such as building age and capital investment timeline impact a building's ability to meet the standard. ACPs provide flexibility and enable buildings to show progress toward the standard.

Stakeholders provided the following feedback during the engagement sessions:

- It is important to recognize that buildings have different capital cycles. ACPs should be available to help buildings whose next upgrade may be beyond the current compliance period.
- The policy should be straightforward and feasible enough that the use of ACPs is the exception, not the rule.

**Key Takeaway:** A Council-appointed technical committee could determine ACPs for inclusion in the policy. Stakeholder feedback will play a critical role in establishing ACPs and identifying building types that should be automatically eligible for ACPs (i.e., historic, low-income multi-family). An example of an ACP for consideration would be a carbon-free electricity metric that increases the requirement for locally produced energy over time.

## **7. Incentives**

Used by building energy policies to help buildings achieve performance standards. The incentives can include innovative programs focused on the policy or existing programs leveraged in new ways to support the policy.

Stakeholders provided the following feedback during the engagement sessions:

- Incentives are critical to the success of a building energy policy.
- Free or subsidized energy audits should be available to buildings covered by the policy.

- Existing financing programs like Property Assessed Clean Energy (PACE) should be promoted to support the policy.

**Key Takeaway:** A Council-appointed technical committee could work with City departments to evaluate existing City programs to determine if they can be adapted to help building owners comply with a policy.<sup>10</sup> The committee could propose ideas for how incentive programs can be leveraged and created. In addition, the City could identify funds to offer a limited number of subsidized energy audits annually for buildings covered by the policy and support an effort to recognize high-performing buildings.

## **8. Compliance and Enforcement Mechanisms**

Help ensure that building owners work toward the targets established by the building energy policy. Other jurisdictions have developed a variety of enforcement mechanisms, ranging from fines to revocation of certificates of occupancy.

Stakeholders provided the following feedback during the engagement sessions:

- The policy should encourage compliance rather than rely on enforcement.
- Develop enforcement mechanisms that can benefit the building in noncompliance, such as requirements for energy audits or retro-commissioning.

**Key Takeaway:** A Council-appointed technical committee could collect stakeholder feedback and propose potential enforcement mechanisms. The policy, through its ACPs, should provide multiple pathways for compliance that encourage building performance improvements. Enforcement mechanisms should help the buildings in noncompliance meet the targets or the ACPs. This could include requiring non-compliant buildings to pay for an energy audit or complete retro-commissioning to improve building operations.

## **9. Program Resources**

Resources provided by jurisdictions to help building owners meet the building energy policy targets. In addition to City staff that implement the policy, a Building Performance Hub operated by the jurisdiction or a non-profit partner can offer resources to building owners.<sup>11</sup>

Stakeholders provided the following feedback during the engagement sessions:

- Building managers need access to educational resources to improve the operation of their buildings.
- Staff will be needed to support building owners, connect them with incentives, analyze data, and oversee compliance and enforcement.
- Program resources should be leveraged to reduce utility data reporting burdens.
- The Hub can serve as a technical and educational resource by providing information on energy saving improvements, financing options, and energy audits.

**Key Takeaway:** A Council-appointed technical committee could evaluate what type of staffing is required to effectively support implementation of a building energy policy. To stand up and run a program would require at least one engagement staff member and at least one

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<sup>10</sup> See Council Item 202401247 which outlines incentive programs available to building owners.

<sup>11</sup> The [Building Energy Exchange](#) in St Louis is administered by USGBC Missouri-Gateway. The [Retrofit Resource Hub](#) in Boston is administered by the City of Boston.

data analyst. The City could seek to leverage economies of scale by joining with other cities in Ohio or the region to fund a Hub that can serve multiple jurisdictions. The City must also continue to pursue ways to minimize the burden on building owners by obtaining utility data on their behalf and attracting resources for incentives.

### **POTENTIAL NEXT STEPS**

There are three steps that Council could consider to advance energy performance in large buildings:

1. **Energy benchmarking ordinance** – This ordinance would establish a mandatory benchmarking program for commercial buildings, including multi-family buildings, over 100,000 square feet and all City buildings over 10,000 square feet. These buildings would be responsible for reporting their energy use on an annual basis. Compliance would be based on verification of the energy data. The benchmarking data could be used as a baseline for a future BPS.
2. **Establish a technical committee to identify the components of future building energy policies** - The technical committee would leverage its knowledge as well as feedback from building sector stakeholders to draft final building energy policy recommendations to present to Council. The opportunity for additional engagement will allow more stakeholders to offer feedback on policy elements.

The Council-appointed technical committee would be responsible for determining the scope, metric, and timeline for a policy as well as establishing achievable performance targets, both interim and final, and advising on ACPs. In addition, it would advise on compliance and enforcement mechanisms and develop a plan for the allocation of any funds collected from fines. The Committee would be responsible for presenting its recommendations to Council within a set time frame.

3. **Building energy ordinance** – This ordinance would incorporate the recommendations from the technical committee to pass a building energy policy for Cincinnati. The ordinance would include all the policy elements (scope, metric, timeframe, performance targets, and alternative compliance pathways) as well as establish compliance and enforcement procedures.

cc: Oliver Kroner, Director, Office of Environment & Sustainability

