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Grace Power
Chief of Staff, New Jersey Board of Public Utilities
Committee Chair, New Jersey Energy Master Plan

Cynthia Holland
Director, Office of Federal and Regional Policy, New Jersey Board of Public Utilities
Group Lead, Sustainable and Resilient Infrastructure, New Jersey EMP Committee

RE: New Jersey 2019 Energy Master Plan

Dear Chair Power and Ms. Holland,

On behalf of the U.S. Green Building Council (USGBC), a non-profit organization with 12,000+ member companies nationwide, and our strong New Jersey-based community, thank you for your public service. USGBC is committed to transforming the way all buildings and communities are designed, built, operated, and maintained. Through high-performance, cost-effective, green buildings that save energy, water, and money, USGBC is promoting environmentally responsible places to live, work, learn, and govern.

USGBC is perhaps best known as the developer of the Leadership in Energy & Environmental Design (LEED) green building program. LEED is the industry standard in green building, and it is proven to reduce energy and resource consumption while saving money for families, businesses, and taxpayers at the same time.

New Jersey is home to more than 650 LEED certified projects spanning over 77 million square feet of real estate, and nearly 5,000 LEED credentialed professionals working in the building design, construction, operations, and maintenance fields. Research estimates that from 2015-2018 in New Jersey alone, green construction will support more than 240,000 jobs, support labor earnings of \$13.74 billion, and contribute \$20.51 billion to the state GDP.¹

New Jersey 2019 Energy Master Plan (EMP)

On behalf of our member organizations and credentialed professionals in New Jersey, USGBC wishes to applaud Governor Murphy's 2019 EMP and the intention to create a strategic vision for the production, distribution, consumption, and conservation of energy in the State of New Jersey. We would like to offer a policy outline that will help meet the five goals for the state and the vision for a sustainable future. We recommend the new EMP include:

- Adoption of the 2018 International Green Construction Code (IgCC) and commitment to a regular cycle of adopting current model codes for residential & commercial buildings.
- Support an annual energy and water benchmarking requirement for buildings 25,000 sqft and larger, and set a minimum energy and water performance standard for those buildings.
- Demonstrate the state's commitment to emission reductions and a sustainable future by leading by example with requirements for

¹ USGBC - Booz Allen Hamilton "Green Building Economic Impact Study," September 2015. See: <http://go.usgbc.org/2015-Green-Building-Economic-Impact-Study.html>



- All new state owned buildings and state owned buildings undergoing major renovations must achieve LEED BD+C Silver Certification (or higher) and receive a Net Zero Carbon Emissions certificate within 18 months of operation.
- All new buildings 10,000 sqft and larger, and buildings undergoing major renovations 10,000 sqft and larger, which receive state funding must achieve LEED BD+C Silver Certification (or higher).
- All existing state owned buildings must achieve LEED for Existing Buildings Certification (phased in over the next 10 years).

International Green Construction Code (IgCC)

New Jersey should include the adoption of the 2018 IgCC and commit to a regular cycle of adopting current model codes for residential & commercial buildings in the 2019 EMP.

The International Green Construction Code (IgCC) is a model code that promotes safe and sustainable construction, establishing minimum regulations for building systems and site considerations using prescriptive and performance-related provisions. It is intended to be an overlay code used with, and is fully compatible with, the Family of International Codes. The IgCC was designed to provide a starting point for states, localities and other jurisdictions striving to write minimum requirements into building codes for building design, construction and operation practices that incorporate an expanded view of safety – water use efficiency, energy efficiency, indoor environmental quality, materials and resource use, construction practices and the building’s impact on the land.

Annual Benchmarking + Minimum Performance Standard

New Jersey should require annual energy and water benchmarking for buildings 25,000 sqft and larger, and set a minimum energy and water performance standard for those buildings.

We recommended the upcoming requirement that all commercial buildings over 25,000 sqft be annually benchmarked through EPA’s Portfolio Manager be expanded to include annual water benchmarking through EPA’s Portfolio Manager, and that subject properties include commercial, industrial and multifamily. We also recommend the requirement include minimum energy and water performance for subject buildings.

A minimum energy and water performance requirement helps raise the performance of existing buildings closer to that of buildings more recently constructed, and thereby subject to more modern energy codes, without instilling additional requirements on buildings that are performing at average levels. The required minimum performance level would be determined from a review of the existing building stock to determine the requirement that would deliver the reduction of energy goals stated for 2030 and 2050. The requirement would be similar to all buildings with an annual energy or water consumption exceeding the average for their building sector must improve performance to above the building sector average or by 20% over 5 years.

Leading by Example

New Jersey should demonstrate their continued commitment to emission reductions and a sustainable future by leading by example with additional requirements beyond those of non-state owned buildings. We recommend that Chapter 296 (2008) be updated to

- 1) Require that new state owned buildings and state owned buildings undergoing major renovations must achieve LEED BD+C Silver Certification (or higher) and receive a Net Zero Carbon Emissions certificate within 18 months of operation,



- 2) Require that all new buildings 10,000 sqft and larger, and buildings undergoing major renovations 10,000 sqft and larger which receive state funding must achieve LEED BD+C Silver Certification (or higher), and
- 3) Require that all existing state owned buildings must achieve LEED for Existing Buildings Certification (phased in over the next 10 years).

Green buildings cost less to operate. On average they are 14 percent less costly to operate than traditional buildings, with most new builds today achieving significantly more energy savings than that.² In addition, the average green building is worth 7 percent more than its traditional counterpart. And for better buildings, accountability makes a difference. Through an independent, third-party verification system, LEED affirms the integrity of green building commitments by ensuring project teams are delivering on design plans and goals. Third-party validation helps guarantee that each project saves energy, water and other resources, reducing the overall environmental impact.

Going beyond reduced operational costs and improved occupant health and comfort, a Net Zero Carbon Emissions certification demonstrates a positive vision of the future, where buildings generate more emissions-free energy than they consume, export clean water and produce zero waste all while enhancing the health and well-being for building occupants.

USGBC respectfully urges you to consider the recommendations of our New Jersey stakeholders as you develop a draft EMP. If you have any questions or wish to discuss these recommendations further, please do not hesitate to contact us. Our members and partners look forward to working with you and your colleagues on ways to achieve sustainability through buildings and infrastructure, in 2019 and in the future.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Gunby".

Jennifer Gunby, PE, LEED AP, AEE-REP
State & Local Advocacy Manager
U.S. Green Building Council

A handwritten signature in cursive script that reads "William Amann".

William Amann, P.E., DCEP, LEED FELLOW
USGBC New Jersey Board Director

Cc: Cynthia Holland Group Lead, Sustainable and Resilient Infrastructure,
New Jersey EMP Committee

² World Green Building Trends 2016 Smart Market Report (<https://www.bdcnetwork.com/green-building-saves-operating-costs-and-boosts-asset-value?eid=330057569&bid=1680707>)