



March 14, 2023

I write today to provide the Minnesota Multi Housing Association's (MHA) position on the DE1 for HF 2269, Energy Benchmarking.

We appreciate that the author reached out to us to engage on this important issue. We are continuing to process the impact of the DE1 amendment but believe it has improved the proposal and addressed two primary concerns of MHA. Our concerns of the original proposal included that there were heavy administrative requirements placed on housing providers and the required disclosure of energy star ratings to prospective customers.

The change to the disclosure requirements and the pivot toward ratings being used as a marketing option for high performers is a welcome improvement. Additionally, the amendment addressed many of the administrative issues we had raised. However, in review of the proposal we are concerned that if energy providers are not generating the energy information as required in this proposal, the requirement would fall back on the housing provider.

We are grateful for the movement in the DE1 amendment. We will continue to work with the author and other stakeholders to address our remaining concerns as we continue to process the DE1 amendment.

Best regards,

Kyle D. Berndt
Director of Public Policy
Minnesota Multi Housing Association

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March 14, 2023

Chair Acomb and Members of the Committee,

We are writing to express our support for House File 2269 (Kraft) and House File 2627 (Carroll).

The transition to a more equitable and cleaner economy means real opportunities for Minnesotans. Cleaner air, better buildings, affordable energy, and local jobs are just a few. If enacted, House Files 2269 and 2627 would move us toward that future through two different, high-impact solutions.

First, we support House File 2269, Rep. Kraft's bill to create an energy benchmarking system for large commercial buildings. Benchmarking is how we measure and report the annual energy use of a building. It's a critical first step for both reducing costs and greenhouse gas emissions. Minnesota has experience with benchmarking in some of our largest cities, like Minneapolis, Saint Paul, and Bloomington. It's a proven and reliable system for better understanding building performance. The bill would establish this system statewide for as yet uncovered commercial buildings over 50,000 square feet. This tool would help put Minnesota on the path to cleaner, more affordable, better performing buildings for everyone.

Second, we support Rep. Carroll's House File 2627, a bill to accelerate the deployment of solar energy systems on closed landfills. This bill would provide \$10 million statewide to retire general obligation bonds on closed landfills. This is a necessary first step for putting this land into use for solar arrays, a clean energy investment that will serve Minnesotans as we transition to 100% clean energy by 2040. The bill includes support for an analysis by Minnesota Management and Budget on the feasibility of expanding this approach to more closed landfills in Minnesota. This is a great example of the kind of iterative learning approach we will need to use to make this transition both effective and inclusive.

Please support House Files 2269 and 2627.

Thank you for your time and consideration,

Aurora Vautrin

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March 15, 2023

Chair Acomb and Members of the House Climate and Energy Finance & Policy Committee:

The Minnesota Chamber, which represents over 6,300 businesses with over 500,000 employees, believes in the triple goal of affordable, reliable, and cleaner energy. We support our members' interests and efforts to advance sustainability, and we work hard to help them reduce energy consumption, divert waste, and minimize environmental impact.

We would like to raise the following concerns with HF 2269 (Kraft):

- The bill would create a new statewide mandate that building owners enter data into a public energy benchmarking database. Minnesota would become only the seventh state in the country to enact a benchmarking requirement while no other state in the region has such a mandate.
- The bill would make significant amounts of commercial building data available to the public including total energy use, energy use per square foot of total floor area, annual greenhouse gas emissions, and an energy performance score. Decisions about third-party access to utility customer data should remain with the customer. Opportunities for a customer to release its utility data already exist and additional pathways to this data raise concerns about trade secrets, international competitiveness, anti-trust violations and security of the data after release.

Minnesota is already a highly regulated and expensive state in which to conduct business. This proposal would add additional costs and burdens when building owners already have other financial and environmental incentives to reduce their own energy use.

Sincerely,

Brian Cook
Director, Energy and Elections Policy



Emily Larson
Mayor

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March 13, 2023

Honorable Members of the Climate and Energy Finance and Policy Committee:

The City of Duluth is writing to support the following **House File 2269 (Kraft)/Senate File 2295 (Mitchell)**: Statewide Commercial Building Energy Benchmarking establishes a requirement for all commercial buildings greater than 50,000 square feet to benchmark and publicly disclose annual energy usage. A statewide program would remove administrative burden from local governments and enable more local governments to better target energy efficiency programs.

Use of energy in Commercial Buildings is the largest source of greenhouse gas emissions for the City of Duluth (<https://www.regionalindicatorsmn.com/city-summary>). Action 3.2 of the City of Duluth Climate Action Work Plan (<https://duluthmn.gov/sustain>) sets a goal to establish a benchmarking program for commercial buildings as a way to encourage energy use reduction over the next five years. However, benchmarking programs require funding and staff capacity to administer, and that is a barrier to our adoption. Establishment of a Statewide program would eliminate this barrier, and allow us to opt-in.

In summary, passage of House File 2269 would be beneficial to cities like Duluth, who have climate goals and desire to track energy use and promote efficiency and conservation in commercial buildings.

Sincerely,

Emily Larson
Mayor



March 14, 2023

RE: City of St. Cloud Support for House File 2269 Energy Benchmarking

Honorable Members of the Climate and Energy Finance and Policy Committee:

The City of St. Cloud supports House File 2269 that would establish a statewide building energy benchmarking program for commercial buildings greater than 50,000 square feet. St. Cloud is a Step Two GreenStep city and has received state and national recognition for its sustainability efforts including five-time recipient of the Water Environment Federation (WEF) Utility of the Future Today Recognition. As the City works to accelerate sustainable actions beyond its own operations, regional and state wide tools that supplement efforts in achieving these goals are especially welcome.

Benchmarking building energy use is critical to managing and reducing consumption. In 2015, the City set a goal to power 100% of its building electrical usage from renewable sources. This goal was achieved in 2020, significantly reducing annual energy costs. A key to the success was the ability to utilize Buildings, Benchmarking, and Beyond (B3), the State's benchmarking program. B3 enabled the development of a baseline for consumption, and the subsequent prioritization of actions and milestones, as well as to track progress towards set goals.

St. Cloud is now expanding City-wide energy goals to include the entire community. A recently announced citywide goal is to have all electrical energy use be carbon neutral by 2028. To achieve this goal, City and community wide collaboration will be vital including partnerships between the City, businesses, institutions and residents on energy efficiency and clean energy strategies. A better understanding of energy consumption amongst the largest users will enable prioritization of efforts toward the greatest opportunities. A statewide benchmarking program would provide valuable data for program design and implementation while preserving significant staff time and resources for other more directed carbon reduction efforts.

Operating a benchmarking program at the state level supports small and medium-sized local governments in achieving their energy and climate goals. Benchmarking offers many benefits to property owners and the communities where they are located. A statewide program will more effectively scale efficiency programs in communities where resources are limited.

Thank you for your consideration.

Sincerely,

Mayor Dave Kleis