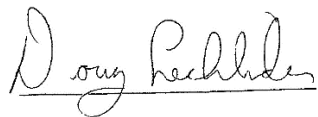


- In Montgomery County, there approximately 11 buildings with agricultural use designations that exceed 25,000 square feet. Most if not all of those are substantially unconditioned space. If only the percentage of the building with conditioned space was taken into consideration, it is likely that none of those buildings would reach the 25,000 thresholds. Additionally, 11 buildings of diverse use (as agriculture tends to be) do not provide an adequate sample size for any relevant data analysis and comparison.
- The last readily available Commercial Building Energy Consumption Survey is 2018. In that report, published by the US Energy Information Administration, of the 5,918 buildings listed in Table B15, there is NO “principal building activity (expanded)” category that shows agricultural buildings so effective benchmarking cannot be done until each unique agricultural building is modeled.
- Agriculture consumed only 1.74% of total US primary energy consumption in 2014 (and that includes all agricultural processes, not just buildings). The county’s focus on commercial and multi-family buildings that produce the most demand and provide the best comparative data set is the best practice nationally.
- Looking at the energy use of one of the 11 buildings on the Montgomery County list of agricultural buildings over 25,000, the average use, because of the very limited energy demands of the building, is approximately \$402 per month so there is little savings value that could be generated from a complicated benchmarking effort that would cost more for data collection and presentation than savings that could be generated.

We thank the County Council for this opportunity to present our views on Bill 16-21 Environmental Sustainability - Building Energy Use Benchmarking and Performance Standards.

Sincerely,



Doug Lechliden, Chairman

Cc: Ludeen McCartney-Green