NAA Policy Resolution

Date: June 14, 2016

Resolution #: 2

Title: Energy Efficiency Benchmarking

Sponsor: Legislative Committee

WHEREAS, energy efficiency benchmarking requirements for apartments are increasingly being adopted at the local level and are the subject of debate in Congress, and

WHEREAS, by their basic density and design, apartments are inherently energy efficient but do represent a significant opportunity for achieving energy efficiency and furthering public policy goals of energy independence and environmental sustainability, and

WHEREAS, energy efficiency benchmarking is an important tool to help achieve that goal by helping to track energy usage over time, compare performance between similar properties and identify areas to improve energy performance, reduce consumption and generate savings for residents, and

WHEREAS, incentives for energy efficiency upgrades both promote energy savings and spur jobs for the construction and manufacturing industries, and

WHEREAS, new loan programs from Fannie Mae and the Federal Housing Administration award significant reductions in the mortgage interest premium based on a property being able to identify building energy performance data; and

WHEREAS, there are challenges with benchmarking programs in multifamily settings, including acquisition of whole-building data, support of local utility providers, addressing resident privacy concerns and education and training of owners and operators new to energy efficiency benchmarking, and

WHEREAS, some local jurisdictions have also proposed aggressive labeling and disclosure requirements and suggested potential mandatory energy efficiency retrofit requirements in the future, and

WHEREAS, mandating unproven energy labels for apartments could cause the property values of older properties to fall significantly, and

WHEREAS, mandatory retrofit or other requirements ignore the unique characteristics of apartment construction, operation and maintenance, impair the ability of the industry to meet growing demand and ultimately increase the cost of housing, and

WHEREAS, mandatory benchmarking requirements may negatively impact the availability of affordable housing.

NOW, THEREFORE, BE IT RESOLVED that NAA supports voluntary benchmarking as a strategy for improving the energy performance of apartment buildings, and

NOW, THEREFORE BE IT FURTHER RESOLVED that NAA opposes mandatory labeling requirements under benchmarking programs, and

NOW, THEREFORE BE IT FURTHER RESOLVED that NAA opposes mandatory efficiency retrofit requirements in any form without sufficient financial resources to adequately offset the cost of such retrofits and limit impacts to the cost of housing, and

NOW, THEREFORE, BE IT FURTHER RESOLVED that NAA urges local, state and federal policymakers to work collaboratively with apartment owners and operators to develop voluntary benchmarking programs that are tailored to the unique characteristics of multi-family buildings, and

NOW, THEREFORE BE IT FURTHER RESOLVED that NAA urges utility companies and other energy providers to supply accurate, aggregated whole building utility consumption data to support benchmarking efforts.