



NEW YORK CITY RECOGNIZES VALUE OF ENERGY EFFICIENCIES WITH LOCAL LAW 87

In the past few years, retro-commissioning (RCx) has gained greater prominence in the New York City market. The systematic RCx process has been influenced by LEED for Existing Buildings, federal requirements in organizations such as the GSA or Veterans Administration, and commercial building real estate portfolios. Another major influence has been the implementation of New York City's Local Law 87, which requires both an energy audit and retro-commissioning to be performed on buildings more than 50,000 square feet.

“ The Greener, Greater Building Plan (GGBP) involved additional requirements to be implemented over the next decade, which include sub-metering, lighting, and energy code improvements.”

The New York City law, established in 2009, set out to improve energy efficiency, reduce the City's environmental impact, and minimize greenhouse gas emissions. Benchmarking the city's fleet of existing buildings was the first step and is now a standard. Building owners are understanding how their individual properties are performing. Energy Audits and Retro-Commissioning were the next initiatives to be implemented through LL87 activities. The Greener, Greater Building Plan (GGBP) involved additional requirements to be implemented over the next decade, which include sub-metering, lighting, and energy code improvements. Auditing and RCx have been in place for two years, with a third set of buildings reaching their due date for compliance on December 31, 2015.

The required energy audit follows a standard set by the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE). Procedures for commercial building energy audit were established in 2004 with a second edition published in 2011. The Level II auditing effort is straight forward for compliance purposes. A number of owners are choosing to pursue the more demanding Level III effort for the valuable information and more detailed analysis provides.

The required RCx process standard is handled very differently. A list of specific RCx tasks are defined in the law, each addressing items which would be part of most standard projects. Base building systems are required to be retro-commissioned, except tenant spaces and equipment. Operating protocols, calibrations, and sequences of operation are essential verifications; maintenance items, training, and building documentation are specifically addressed. The requirement falls short in that specific accepted standards are not referenced, such as ASHRAE



202-2013 'Commissioning Process for Buildings and Systems', NEBB 'Procedural Standards for RCx of Existing Buildings', and others. Specific organizations qualifications are referenced in LL87. These qualifications point to the issuing organizations training or reference standard such as the Building Commissioning Associations CCP designation.

“ Increased focus on accepted standards and methods for the RCx process will contribute to compliance levels and ensure uniform performance.”

The referencing of various qualification standards establishes a wide range of effort level to comply with the LL87 Retro-Commissioning requirements.

New York City has also promulgated 'rules' which further clarify procedures required and present a detail of effort for specific tasks. The rulemaking process has set out to define specifics for owners and RCx firms and minimizes the interpretation of the original law. These rules leave several specifics unclear, for example, boiler tuning. A record of tuning effort is required within a 12-month period, however, startup testing, combustion monitoring, and step loading testing are not addressed. While compliance in the boiler case may default to the testing requirements presently in place for air permits, this may not be suitable for optimum performance and it can be costly.

The increased RCx activity in the New York City market is a huge stride in meeting green sustainability goals for the city. Implementation of defined energy auditing standards is helping to meet the intended efficiency analysis requirements. Increased focus on accepted standards and methods for the RCx process will contribute to compliance levels and ensure uniform performance.

For more information on RCx and New York City LL87 see the New York City [website](#) or contact MBP's New York office at 212-964-4338.