

Building Emissions Reduction and Disclosure Ordinance Phase 1 Regulations

Comments received on draft regulations during public comment period ending at 5:00pm on Friday, February 11, 2022.

COMMENTS	SUBMITTED BY	STAFF RESPONSE
THIRD PARTY VERIFICATION		
<p>Recommendation: A Better City recommends amending the regulatory language to clarify the types of reporting data that will need to be verified in 2022, 2026, and in subsequent years.</p>	<p>A Better City</p>	<p>The regulations specify that third party verification is required for all reported data. The guidance documents provide additional detail on what specifically third-party verifiers should check. The information needed to verify will change once a building is required to comply with the emissions standards. We recommend keeping the detailed verification information in the guidance documents. The guidance documents will be updated for years where verification of compliance with emissions standards is required once those regulations are developed.</p>
<p>Recommendation: A Better City recommends the City re-consider the Phase I draft regulatory language for BERDO 2.0 to allow for the use of in-house Qualified Energy Professionals as data verifiers, with protocols to ensure the veracity of data, in order to encourage workforce development in large existing</p>	<p>A Better City</p>	<p>The ordinance specifies “third-party” verification. The law department confirmed that the plain language of “third-party” means that verification cannot be conducted by the building</p>

buildings.		owners, as it implied an independent verification. A change to allowing in-house verification would require a change to the ordinance.
<p>I noticed there is a BERDO requirement for Third Party Data Verification that does not allow a person with the proper credentials to verify the data if they work for the company. The credentials are not easy to achieve and are only awarded to people with high integrity and sound business ethics. It is my opinion that individuals with the proper credentials should not have to reach out to another party with the same credentials to verify the data, which is not really possible unless the third party did the work to get the data to start with. Companies such as the one I work for hire individuals such as myself to handle these types of tasks. Should Energy related responsibilities be passed along to a third party, it is less likely that companies would hire their own Energy Professionals which is counter productive to the goal of requiring companies to be proactive in their efforts to reduce their carbon footprint. There is no benefit to requiring third part verification if a person on staff has the proper credentials. If it is a matter of keeping people honest, I would venture to say that those that are not honest would get a third party to sign off on the data without actually verifying the data. Those that are honest would just be subjected to an undue burden and expense, in addition to having their value to an employer decreased.</p>	Jonathan Owens, CEM	The ordinance specifies “third-party” verification. The law department confirmed that the plain language of “third-party” means that verification cannot be conducted by the building owners, as it implied an independent verification. A change to allowing in-house verification would require a change to the ordinance..
We support the requirement that qualified Energy professionals verifying Building data may not be “on the staff of a Building’s Owner or Building’s management company”...The language and purpose of the data verification provisions prohibit qualified	ACE	Thank you for this comment. We agree with the plan language interpretation of “third party.”

<p>Energy professionals from verifying the data of Buildings owned or managed by their employers. The plain meaning of “third party” requires Building Owners to engage independent qualified Energy professionals to verify Building data.</p> <p>Further, BERDO’s data verification requirement is the Ordinance’s primary monitoring and enforcement mechanism. The City of Boston lacks the resources to monitor the thousands of Buildings subject to BERDO’s requirements. Without independent verification, inaccurate data will go undetected, falsely indicating Buildings’ compliance with BERDO’s emission standards and frustrating the Ordinance’s penalty structure. Independent data verification is essential to effectuating BERDO’s purpose “to reduce the emissions of air pollutants, including greenhouse gases, from building energy production and consumption, and thereby to encourage efficient use of energy and water, develop further investment in building a green economy, including by encouraging the hiring and training of green jobs, protect public health, and promote equitable access to housing.”...</p> <p>Accordingly, we conclude that BERDO requires independent data verification as formulated in Section 1.08 and request that the Regulation be adopted as written in the draft.</p>		
<p>Recommendation: A Better City recommends amending the regulatory language to allow for the creation of a Qualified Energy Professional (QEP) Cooperative of data verifiers for BERDO 2.0, with appropriate accountability measures like legal attestations and random audits.</p>	<p>A Better City</p>	<p>We appreciate this creative suggestion and believe it could be a productive option for large buildings in Boston. We believe this idea is already allowable under the drafted regulations and would not require a modification to the regulations to be implemented. We believe that coordinating between QEPs would be valuable and the Environment</p>

		Department staff would like to meet with stakeholders to discuss this idea further outside of the regulations process.
<p>As you are aware, BERDO defines a discrepancy between an Owner's self-reported data and third-party verification of that data as a violation "subject to a fine between one thousand dollars (\$1,000) and five thousand dollars (\$5,000)."</p> <p>The Regulations provide that in the event of such a discrepancy, "Owners shall submit an updated report as outlined in guidance documents provided by the Commission." Given the importance of the penalty structure in achieving BERDO's goals, we request this Regulation be amended to clarify that discrepancies between self-reported and verified data are a violation subject to a fine as stated in Section 7-2.2(q)(iii).</p>	ACE	<p>Thank you for this comment. Given that this is already detailed in the ordinance, we recommend that staff review this language during future phases of the regulations that more directly focus on enforcement.</p>
PROCESS		
<p>Recommendation: A Better City supports the current draft regulatory markups to consider additional reporting extensions on a case-by-case basis, and recommends working with the utilities on the automatic uploading of energy use data to Portfolio Manager.</p>	A Better City	<p>We continue to work with the utilities to streamline reporting and improve data quality. We do not recommend adding in language to the regulations on this.</p>
<p>NAIOP is concerned with the abbreviated timeline between the closing of the public comment period and the February 14 public meeting of the Air Pollution Control Commission (APCC), which has the agenda item, "Discussion and Vote on the Proposed First Phase Draft Regulations." Given that this meeting is scheduled for less than one full business day after the closing date for public comment, it is concerning to NAIOP</p>	NAIOP	<p>We have completed a thorough review of all comments received to date. This document contains a summary of all comments with detailed staff responses to each specific comment and request.</p>

<p>that a potential vote could occur ahead of full and proper examination of all comments received to date. NAIOP urges the APCC to delay a vote until all public comments can be properly analyzed and addressed to the extent possible.</p>		
<p>Echoing comments received during the initial public engagement on the draft regulations, NAIOP requests that the requirement for third-party verification be delayed well beyond the first year of reporting, given that third-party professionals will need ample time to learn and implement the City’s requirements for verification in order to properly manage this process. While we understand, as outlined in the staff response to comments dated January 21, 2022, all owners are entitled to apply for a 6-month extension on their reporting and verification for 2022, given that this is likely to be a ubiquitous issue with all data verification this year, to ensure accuracy and fairness NAIOP urges the Commission to consider allowing a one time extension to all buildings reporting in 2022 so that ad hoc reporting waivers and extensions do not take up the Commission or staff’s time during this period.</p>	<p>NAIOP</p>	<p>We appreciate the concern raised in this comment, however we believe that the change made to the regulations to allow an additional extension for verification this year provides ample flexibility to accommodate unforeseen challenges. We do not recommend adding an additional extension for all buildings. Getting accurate data as soon as possible is critical for building owners to successfully plan for complying with the forthcoming emissions standards.</p>
<p>GROSS FLOOR AREA</p>		
<p>1.04b outlines the Gross Floor Area calculations for a building reporting under these regulations. NAIOP would like to understand how garage and utility use should be incorporated into this calculation and hopes the Commission can include language clarifying these uses in the Gross Floor Area calculation.</p>	<p>NAIOP</p>	<p>The Ordinance defines Gross Floor Area as, “the total number of square feet measured between the principal exterior surfaces of enclosing fixed walls.” Utility rooms and enclosed garages are considered part of square footage. For determining compliance with the ordinance, parking should not be counted when determining if a building</p>

		is 20,000 SF or greater. However, if a building is deemed to have to comply with BERDO, enclosed parking must be reported as part of the Gross Floor Area.
GUIDANCE DOCUMENTS		
1.04d states that “owners must account for any vacant or unoccupied space in Portfolio Manager in accordance with Portfolio Manager instructions or with guidance documents issued by the Commission,” (3). NAIOP would like clarity as to how and when these guidance documents will be developed, how feedback from the building community will be incorporated, and how the information will be distributed to building owners.	NAIOP	We will be releasing relevant parts of the draft guidance documents this week and will welcome comments from the building community. We will continue to add clarifying language and instructions to the guidance documents as we learn more about the reporting process and get feedback from building owners.
Recommendation: A Better City recommends developing guidance documents for sub-metering, high performance design and construction of tenant spaces, green leases, and compliance cost sharing to incentivize both owners and tenants to share data and comply with energy and emissions reductions goals required by BERDO 2.0.	A Better City	Thank you for this comment. We agree that strong coordination and collaboration between property owners and tenants is necessary to achieve our decarbonization goals. We plan on developing additional guidance on these topics over time and welcome input from ABC and other organizations with experience in these areas.
DEFAULT VALUES		
Regarding 1.04e (ii) (1), NAIOP is concerned as to why unknown space should be multiplied by one hundred and fifty percent and urges the Commission instead to consider adopting language that would require energy use in unknown space to	NAIOP	The 150% multiplier is intended to encourage full reporting of all energy usage in all spaces so compliance with emissions standards is based on real

<p>be extrapolated based on the rest of the building's similar uses. NAIOP is concerned that, as drafted, the one hundred and fifty percent calculation appears unfair and would potentially be more than the Appendix B values.</p>		<p>data rather than estimated values.</p>
<p>1.04e (ii) (2) and Appendix B NAIOP believes it would be helpful to building owners for the Commission to further clarify the use of the table in Appendix B to indicate that the only energy values that should be used are for the energy use types that are known to serve the building, but where the specific quantity may be unknown.</p> <p>NAIOP also hopes the Commission will adopt language to ensure the regulated community understands how the fuel oil, district heating and district cooling values in Appendix B are calculated. NAIOP's members are concerned that the values currently within Appendix B appear low in relation to the electricity or natural gas values.</p> <p>Example: District Cooling for Assembly Use: If you have 0.317kBtu/sqft/month of district cooling and assume that would instead be provided by an air-cooled chiller with a COP of 2.5 it would be 0.1268 kbtu/sqft of electric—vs the 6.6293 kbtu/sqft of electric that should be assumed if the electric service was not metered. While NAIOP assumes that there are other electrical uses included in the 6.629 kbtu/sqft, the difference between the two numbers appears significant and NAIOP hopes that the Commission will spend time clarifying these calculations to ensure proper implementation and reporting.</p>	<p>NAIOP</p>	<p>Thank you for this comment. In reviewing Appendix B, we have identified that the methodology used to calculate default values greatly underestimated the values for thermal loads other than natural gas. We recommend revising the methodology and moving the Appendices to separate policy documents that can be more easily updated by the Commission in order to allow for refinement of these values as new annual data is released. We will also include a description of the methodology in the updated appendix for increased transparency.</p>
<p>We support the 150 percent multiplier in extrapolating Energy use data where partial data for at least 50 percent of the given Building Use is known. We recommend a similar multiplier within</p>	<p>ACE</p>	<p>Appendix B values already include a 150% multiplier. However, we have identified that the methodology used to</p>

<p>the default values for calculating Energy use where Owners have data for less than 50 percent of the given Building Use. As noted above, accurate Building data are essential to monitoring Buildings' compliance with BERDO's emissions standards and achieving its emissions reduction goals. Default Energy intensity values cannot account for Building anomalies that may result in higher-than-average Energy usage. In these instances, Whole-Building Data would identify these anomalies and encourage Owners to improve Energy efficiency before emissions standards go into effect in 2025. The methods for extrapolating unknown data should therefore incentivize Owners to 14 acquire Whole-Building Data whenever possible. Therefore, we request that Section 1.04(e)(ii)(1) of the Regulations requiring a 150 percent multiplier for data extrapolation from partial Building data be adopted as written. We further request that the default values in Appendix B be updated to include a similar multiplier, if necessary, and that Section 1.04(e)(ii)(2) be amended to clarify that the default values use this multiplier.</p>		<p>calculate default values greatly underestimated the values for thermal loads other than natural gas. We recommend revising the methodology and moving the Appendices to separate policy documents that can be more easily updated by the Commission in order to allow for refinement of these values as new annual data is released. We will also include a description of the methodology in the updated appendix for increased transparency.</p>
<p>CORRECTING DATA</p>		
<p>Regarding 1.04h, NAIOP would respectfully ask that the Commission consider defining the percentage change to occur over the course of one year. Additionally, NAIOP hopes the Commission will consider raising the threshold percentage from two percent to five percent, as two percent is a very small change in a multi-tenant building where each tenant may have their own data being provided to a property manager. Raising the threshold to five percent would lessen the burden on a building owner to constantly update the changes while still providing accurate reporting information. Finally, NAIOP hopes the Commission will consider adding the phrase "whole building" as shown in red</p>	<p>NAIOP</p>	<p>Thank you for this suggestion to add clarifying language to this section. We agree with the recommendation to add "whole building" and "over the period of one (1) calendar year" to this sentence to clarify which emissions and energy usage are being considered in this section. We do not recommend changing the 2% to 5%, as this will have a more significant impact on compliance with emissions standards.</p>

<p>below. If, after having submitted a report to the Commission, the Owner of a Building changes or an Owner receives or becomes aware of new or updated information that would result in a change to whole building Emissions, Energy or water use, or Emissions or Energy Intensity of two percent (2%) five percent (5%) or more over the period of one (1) year, the Owner shall, within thirty (30) Days of the change or of receiving the new information, submit the additional or corrected data to the Commission in accordance with guidance documents issued by the Commission, and notify the Commission accordingly. Owners may submit other updates at any time. The Commission will include such updates in its annual disclosure of data.</p>		
<p>NEWLY CONSTRUCTED BUILDINGS</p>		
<p>1.07 Special Conditions a. For newly constructed buildings, the regulations as drafted require the first reporting requirement to be the first full calendar year following the issuance of a Temporary Certificate of Occupancy for the building or a Certificate of Occupancy for the Building, whichever is earlier. Given commercial buildings may have many small tenants, NAIOP suggests that this threshold be changed to the first full calendar year following the occupancy of the first major tenant (or tenants totaling over 40% of building occupancy) or two years after the Certificate of Occupancy. This change would ensure that the data reflect tenant use accurately.</p>	<p>NAIOP</p>	<p>We do not recommend changing this requirement, as it would add a significant amount of burden on staff to determine when a building needs to comply and would complicate notification. As written, staff can review the dates when Certificates of Occupancy are issued in order to identify new buildings that are required to comply with BERDO.</p>
<p>We thank you for your work to reduce Greenhouse Gas Emissions from existing city buildings and buildings built as new construction. As a resident of Boston and a BPS graduate, I applaud your work to push forward with this difficult and</p>	<p>Francis Stone Jamaica Plain Resident</p>	<p>Thank you for this comment. We continue to work closely with the BPDA to ensure alignment between all new construction policies and BERDO. There</p>

<p>important task. I have been to many of the Climate Resilience meetings hosted by the City of Boston to prepare for climate change as well. I have been impressed by the level of coordination and thought that has gone into dealing with the multifaceted problem of climate change.</p> <p>My comment has to do with a small request for consistency in the emission standards set for existing multifamily buildings and new construction buildings. The BERDO 2.0 standards set an expected target for Multifamily Buildings in 2035 of a CEI of 1.8. In a recent BPDA publication <i>Article 37 Interagency Green Building Committee, Multi-Family Residential - Low Carbon Building Best Practices</i>, the target CEI standard for buildings in 2035 on page 1 of that document is put forward as a CEI of 1.6 for the year 2035. So that I can communicate clearly with those who I work with, including developers and portfolio owners in the city, many of whom have extensive affordable housing portfolios, and would like to both understand and then achieve these worthy standards, can this number be clarified to be consistent in both documents?</p> <p>Again, we thank you for your work, and for listening to this small request to coordinate a common understanding of the expected CEI number for buildings in 2035.</p>		<p>are a few key differences between the BERDO emissions standards and the CEI targets presented as part of Article 37. First, BERDO's emissions standards have been set in the adopted ordinance and are inclusive of renewable energy purchases, and are reflective of a decarbonization pathway for existing buildings. The CEI targets included in the referenced document are <i>recommended</i> targets for new construction performance and are not inclusive of renewable energy purchases. The primary reason for the difference in the numbers is that BERDO applies to ALL large existing buildings in Boston, including those that were built hundreds of years ago and those that opened last year. New technology and design practices allow new construction to meet much lower emissions targets. The CEI presented in the reference document is reflective of best practice in new construction in Boston.</p>
<p>BUILDING USE CATEGORIZATION</p>		
<p>Appendix A a. NAIOP urges the Commission to reevaluate Appendix A, specifically to evaluate the combinations of use type breakdowns. NAIOP believes these categories appear very broad. For example, the category for Food Sales/Service use does not recognize the</p>	<p>NAIOP</p>	<p>We appreciate that not all buildings will align perfectly with the categorization of building use types in Appendix A. That is why this is only one of several pathways for compliance with the emissions</p>

<p>difference between a 24-hour facility that may be open for business compared to one that may have more limited open hours.</p>		<p>standards. Buildings may apply for Individual Compliance Schedules or Hardship Compliance Plans in lieu of complying with the emissions standards detailed in Table 1 of the Ordinance.</p>
<p>CAMPUSES</p>		
<p>Portfolio Reporting – Due to the nature of their operations, universities approach climate action from a portfolio-wide organizational basis in order to prioritize efforts which will have the greatest GHG reduction benefit. With this in mind, we respectfully request that when an entity is unable to separately report energy use for each building on its campus (particularly for steam and chilled water) that the language (i) allow reporting by meter and (ii) clarify that reporting be in alignment with ‘Portfolio Manager Campus Guidance’. Specifically, under Section 1.07 Special Conditions we have suggested language that we hope will be helpful given the complexities of this specific reporting scenario:</p> <ul style="list-style-type: none"> o (i) For any energy and/or water use that is separately metered or sub-metered, data must be reported for each such meter. o (iii) For entities that operate as a campus with a mix of use types (across buildings and within buildings), utility meters, and wholly-owned energy distribution systems (steam, chilled water, etc.), we respectfully request that the regulations allow these entities to report all energy and water use by meter and all building information (primary use type, square footage) by building, tied to a parent property, in accordance with EPA Portfolio Manager Campus Guidance: <p>https://www.energystar.gov/sites/default/files/tools/How%20to%2</p>	<p>MASCO</p>	<p>Thank you for these comments. The intention of the regulations is to require all buildings to report as separate buildings wherever possible. Campus reporting through Portfolio Manager is allowed for buildings that share systems. We recommend making minor revisions to this section to add additional clarification. BERDO does not require the installation of submeters. As a reminder, “Portfolios” for the purposes of complying with the emissions standards are separate from the campus reporting process in Portfolio Manager. Compliance with BERDO emissions standards as a Portfolio must be approved by the Review Board.</p>

<p>0Benchmark%20a%20Campus_0.pdf</p> <p>o For academic members where steam meters will be particularly difficult and expensive to install, creating additional burden if the City will require them for BERDO reporting compliance, we ask if the City would consider providing an incentive or rebate towards installation of these submeters.</p>		
<p>As you are aware, BERDO requires Building Owners to report “Energy and water use of each Building.” Reporting individual Building data promotes accuracy, which as previously stated, is essential to achieving BERDO’s emissions goals.</p> <p>The Regulations provide that Buildings with shared Energy or water systems that have different Building Uses and are not separately metered “should be reported as a campus as defined in Portfolio Manager.” Alternatively, “[t]he Commission may approve an alternative apportionment process proposed by the Owner.” The “campus” designation and alternative apportionment process may disregard relevant differences between Buildings with shared utilities, compromise the accuracy of data reported for these Buildings, and ultimately undermine BERDO’s emissions goals. Accordingly, we request this Regulation be amended to identify guidelines the Commission should use in approving an alternative apportionment process, or at a minimum, to provide for a process of setting guidelines that will be undertaken by a certain date to provide clarity.</p>	ACE	We expect this to arise in very rare circumstances and believe the regulations provide clarity on the guidelines to follow. We will review campus reporting after this year and will develop additional guidelines if needed.
DATA DISCLOSURE		
<p>We support the Commission’s authority to disclose all information reported pursuant to BERDO, including optional information, and the recommendation that “Owners . . . report all</p>	ACE	Thank you for this comment.

<p>Building Uses and associated square footage in Portfolio Manager, including Building Uses that occupy less than ten percent (10%) of the Building's square footage.”</p> <p>ACE and other organizations have consistently requested utility data transparency, which BERDO promotes by adopting a policy of public access to data. The Ordinance requires the Commission to disclose, “at a minimum, Building identification, Energy intensity, CO2e Emissions per square foot, Emissions compliance status, ENERGY STAR rating, where available, and water consumption per square foot,” and allows disclosure of contextual data that is voluntarily reported. Moreover, the Commission must publicly disclose information and issue reports concerning progress on BERDO's goals and impacts on Environmental Justice Populations.</p> <p>BERDO's policy of disclosure and data transparency promotes accurate reporting of data and public accountability. Accordingly, we request that Sections 1.10 and 1.04(c) be adopted as written.</p>		
<p>We support the requirement that Owners request data from non-residential Tenants at least twice in writing and report Tenant non-response to the Commission.</p> <p>As noted above, data accuracy and transparency are central to BERDO's emissions goals and are among our primary concerns. As you are aware, BERDO requires non-residential Tenants to comply with Owner requests to report energy and water data. It also provides for enforcement measures for a non-residential Tenant's failure to comply. Two requests in writing provide ample notice to Tenants of their reporting responsibilities. Moreover, the requirement that Owners report Tenant non-response allows the Commission to initiate the proper enforcement proceedings to obtain separately metered Tenant</p>	ACE	Thank you for this comment.

data. Accordingly, we request that Section 1.05(b) be adopted as written.		
PRESERVATION OF RECORDS (comments made during hearing)		
Preservation of record language is confusing and the retention period for data verification is not sufficient for law enforcement. 10 years would be more appropriate.	M. Ferrenz	Staff recommend clarifying and simplifying the language to require all relevant records to be preserved for 10 years.

GENERAL COMMENTS

<p>My primary concern is two-fold. First, there is a massive expense being placed on the landlords of all buildings in the BERDO plan but primarily those built 100 plus years ago. They simply were not constructed with materials or infrastructure that will comply with the rigid standards being set. I know of buildings that are along 15 years old and are having difficulty complying. I believe the benchmarks are too aggressive for older turn of the century properties less than 100,000 square feet. To comply, this means spending an enormous percent of the gross revenue these properties pull in. Tack on COVID-19 and we our rents are \$10- \$20 a foot less than when it began and compounded by falling occupancy due to remote workers. The capital expenditure is too much of a burden and additional exceptions need to be created.</p> <p>My second issue is that the process has become massively complex. As with most government policies, it is now becoming nearly impossible for building owners to navigate these new</p>	<p>Jeff Larson Director of Property Management Aegean Capital LLC</p>	<p>Thank you for this comment and for sharing your concerns with the ordinance. Building owners will be able to apply for Individual Compliance Plans and Hardship Compliance Plans. These options create some flexibility for owners of buildings with challenging characteristics. We also hear your concern about the cost of compliance, particularly with third-party verification. We anticipate that third party verification will be less expensive than a full audit and believe it is necessary to have accurate data ahead of compliance with emissions standards.</p>
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<p>policies without hiring a 3rd party. I wear many hats in trying to run our 5-building portfolio in Boston, and learning the process, understanding the changes, and trying to create accurate data is becoming too difficult. Furthermore, I am now being forced to have 3rd party reviews on properties that were just fully audited a few years ago. These audits cost upwards of \$16,000 per building which is far more than they can afford.</p>		
<p>I think that fining someone for not hitting goals is counter productive and will turn people off. Let me know if I can speak about this</p>	<p>Andrew O'Connell</p>	<p>Staff responded with instructions on how to provide oral testimony during Monday's hearing.</p>

<p>LMEC greatly appreciates the City's thoughtful review and incorporation of those comments into the Revised Draft Phase I Regulations now under review by the City. As the City moves ahead with its implementation of BERDO 2.0, LMEC looks forward to reviewing and providing comments to the City on the scope and extent of additional information that may be required under the City's proposed Supplemental Reporting Form, especially with respect to any reporting required for power purchase agreements, renewable energy certificates, data verification, and backup generation. LMEC applauds the City's efforts to ensure that Boston will achieve its climate goals, which include reducing greenhouse gas emissions associated with the operation of healthcare and biomedical institutions. LMEC looks forward to working with the City further to address the unique challenges that LMEC's members face in reaching the required performance standards, and welcomes the opportunity to engage in ongoing dialogue and cooperation as the City continues the regulatory process for</p>	<p>Longwood Medical Energy Collaborative</p>	<p>Thank you for this comment.</p>
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BERDO 2.0.		
<p>As you know, COBTH's member hospitals provide the highest quality medical care, in addition to training the next generation of physicians and other health providers, and conducting cutting-edge medical research. We believe that the mission of our teaching hospitals and the City's efforts to reduce carbon emissions are aligned. To that end, we wanted to express our gratitude for the Environment Department's thoughtful and professional approach to developing regulations to implement Phase 1 of BERDO. COBTH submitted comments to the Environment Department on the draft Phase 1 regulations, and greatly appreciated the opportunity to share our hospitals' unique perspective on implementation and workability. We were pleased to see that some of COBTH's feedback was incorporated into the final regulations currently under review by the APCC. We look forward to continuing to engage with the Environment Department and the APCC as the regulatory process advances, and look forward to the opportunity to provide additional feedback on forthcoming regulations, guidance documents, and reporting forms currently under development.</p>	Conference of Boston Teaching Hospitals	Thank you for this comment.
<p>Phase 2 - Our shared members look forward to Phase 2, including review and comment on the proposed Supplemental Reporting Form, with specific interest in the reporting requirements for: Power Purchase Agreements, Renewable Energy Credits, data verification and back-up generation.</p>	MASCO	Thank you for your comment.
<p>Letters of support for BERDO and the regulations as drafted.</p>	Steven Munn, Kara Orsini, Julia Sullivan, Caroline	Thank you for these comments.

	Fraser - Northeastern Students	
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