



Statement of Project Objectives  
[SE0001537] [0000]  
City of Milwaukee  
City of Milwaukee Benchmarking and Building Performance Standards Policy  
Development and Implementation

## A. Project Objectives

Specific Project Goals include:

**Goal 1:** Reduce energy use from Milwaukee's existing commercial building stock through adoption of a BPS equivalent to the latest model code commercial provisions of ASHRAE Standard 90.1-2019 and existing multifamily building stock equivalent to the latest model code residential provisions of the 2021 IECC to help meet the City's Climate and Equity Plan interim goal of reducing greenhouse gas emissions 45% by 2030.

**Goal 2:** Create hundreds to thousands of green jobs to support the transition of the energy and transportation systems and to decarbonize the building stock. These jobs will pay a living wage (at least \$40,000 per year) and recruitment for these jobs will focus on underserved communities of color in the City of Milwaukee

**Goal 3:** The end of project goal is to have an effective and equitable Building Performance Standard ordinance that covers large commercial and multifamily buildings in the City of Milwaukee, while creating green jobs that pay a living wage with recruitment focused on communities currently underrepresented in those fields.

Specific Project Objectives (per Budget Period, if applicable):

**Budget Period 1: Kick-off and Implementing Benchmarking**

*BP1, Objective 1:* Implement and Operationalize the Milwaukee Efficient Buildings Benchmarking Program ordinance, including launching the Commercial Buildings Help Desk and Resource Center and achieving a successful first submission of Energy Use Intensity (EUI) data from commercial buildings 50,000 square feet and larger, and government buildings 10,000 square feet and larger.

*BP1, Objective 2: Develop BPS Program Plan*



*BP1, Objective 3: Commence preliminary community and workforce engagement efforts for BPS ordinance development, including procuring a stakeholder and community engagement consultant*

**Budget Period 2: BPS Development and Adoption**

*BP2, Objective 1: Launch a public campaign and comprehensive stakeholder and community engagement process to inform BPS development.*

*BP2, Objective 2: Develop BPS targets, rules, and regulations, utilizing EUI data submitted through the benchmarking ordinance.*

*BP2, Objective 3: Internal City and external partner capacity building to support buildings in meeting future BPS targets.*

**Budget Period 3: BPS Implementation**

*BP2, Objective 1: Formal adoption of a BPS ordinance or law by City of Milwaukee elected officials.*

*BP2, Objective 2: Expand the Commercial Buildings Help Desk and Resource Center services to support buildings' compliance with the BPS, including the technical assistance program for Equity Priority Buildings.*

*BP2, Objective 3: Continue supporting and expanding workforce development efforts to help buildings meet the new BPS targets.*

**Budget Period 4: BPS Compliance and Enforcement**

*BP3, Objective 1: Operationalize the BPS ordinance, to assist buildings in meeting the first voluntary compliance deadline.*

*BP3, Objective 2: Continue supporting the Equity Priority Buildings program*

*BP3, Objective 3: Continue supporting and enhance workforce development efforts to help buildings meet the new BPS targets.*



## B. Technical Scope Summary

Summary of Work Scope (per Budget Period, if applicable):

**Budget Period 1 (Q1 2025 to Q4 2025): Operationalize the Milwaukee Efficient Buildings Benchmarking Program ordinance and prepare for BPS Development:**

The City of Milwaukee Environmental Collaboration Office (ECO) and their selected consultant will launch the Commercial Buildings Help Desk and Resource Center to assist building owners in complying with the first benchmarking ordinance deadline of June 30<sup>th</sup>, 2025. The benchmarking ordinance will apply to large commercial buildings that are over 50,000 square feet, as well as to government buildings 10,000 square feet and larger. Most building owners will comply and successfully share their Energy Use Intensity Data with the City of Milwaukee ECO. The City of Milwaukee ECO will also begin preliminary community and workforce development engagement efforts, and procure a stakeholder and community engagement consultant to support comprehensive BPS stakeholder and community engagement in BP 2. The end-result of this period is for the City of Milwaukee to have an implemented, and operationalized benchmarking ordinance, a Commercial Buildings Help Desk and Resource Center to support building owners with benchmarking ordinance compliance, and preparations are set for comprehensive stakeholder and community engagements for BPS development in BP 2.

**Budget Period 2 (Q1 of 2026 to Q4 of 2027):**

**Comprehensive stakeholder and community engagement, and development of the BPS ordinance:** The City of Milwaukee ECO will work with its selected consultant to ensure comprehensive and robust stakeholder engagement, including no fewer than twelve meetings across a diverse group of stakeholders, including six of those meetings with stakeholders from disadvantaged communities that are more likely to be challenged to meet with BPS targets. ECO will again engage key stakeholders that we have already engaged for feedback on the proposed benchmarking ordinance, including the Wisconsin Chapter of the Building Owners and Managers Association (BOMA), NAIOP (a commercial real estate trade association), the Apartment Association of Southeastern Wisconsin (AASEW), the Wisconsin Association of Energy Engineers (WAE), We Energies, Focus on Energy, as well as environmental nonprofits, sustainability-focused community-based organizations, and low-income housing representatives. This collaborative process with a diverse array of stakeholders will be crucial in establishing consensus on the ordinance language, metrics, and compliance pathways, paving the way for the adoption of the ordinance.

**Budget Period 3 (Q1 2028 to Q4 2028):**

**Adopt and Operationalize a Building Performance Standards Ordinance:** Upon adoption of the BPS ordinance, ECO will continue and expand the services of the Commercial Buildings Help Desk and Resource Center with our selected consultant, including implementing the Equity



Priority Buildings technical assistance program. The consultant will operate a full time Commercial Buildings Help Desk and Resource Center to continue assisting building owners and managers with compliance with the annual energy benchmarking, but will add more services to the Help Desk, to support them understand the BPS requirements, use software tools to plan for compliance, complete administrative processes (such as filing for an extension, exemption, or alternative compliance path). The Help Desk will be staffed with trained sustainability/benchmarking consultants from 9:00am – 5:00pm, Monday through Friday. All building owner communications, including both emails and phone calls, will be tracked through the consultant's customer relationship management tool.

**Budget Period 4 (Q1 2029 to Q4 2030):**

**Enforcement and Ongoing Implementation of the Building Performance Standards Ordinance:**

The City of Milwaukee ECO will develop, finalize, and begin implementing compliance and enforcement proceedings for covered buildings as the first compliance period deadline approaches. Outreach and assistance will be available to buildings that require it and the project team will work to ensure that compliance information including status, required actions, and enforcement information are communicated clearly and in a timely manner. The Project Team will also develop a plan detailing the long-term implementation needs and strategy for the Ordinance to ensure that the energy savings and other benefits continue to be delivered to communities across the City and region.

## **C. Tasks To Be Performed**

**Budget Period 1 – Launch, Stakeholder Engagement, and Benchmarking (M1-**

**M12):** The project will start by finalizing scope and plans that are required for the successful adoption and implementation of the proposed BPS. The benchmarking ordinance that was adopted in July 2024 will be supported by a new commercial buildings help desk and resource center. The City of Milwaukee will also work through its first reporting deadline, collecting empirical data on Energy Use Intensity in large commercial buildings in the City of Milwaukee which will inform reasonable BPS targets for different building types. Stakeholder and community engagement efforts will also commence with the creation of a preliminary engagement strategy, development of a Stakeholder Advisory Committee, and the hiring of a consultant to facilitate the City's comprehensive BPS Stakeholder Engagement process.

**Task 1.0: Project Ramp Up (M1-M2)**

**Task Summary:** Task is designed to finalize the scope of work for the entirety of the project, identify critical partners and begin the contracting process necessary to bring them on as part of the project team. Criteria for contracting should reference established best practices for



engagement, communication support, accessibility, and representative participation in line with the latest guidance.

**Subtask 1.1: Project Kick-off and Finalize Project Management Plan (M1-M3)**

**Subtask Summary:** Team kicks off the project and finalizes the project management plan with support from DOE. The team will address a series of topics including but not limited to: procurement and hiring processes and evaluation criteria, additional partner and/or organizational needs to augment the project team, identify and set a timeline for community and stakeholder engagement efforts, coordination efforts with neighboring jurisdictions and state level activities, power mapping for policy and program development and implementation, and more.

**Milestone 1.1.1:** Host kick-off meeting and finalize the project management plan.

**Milestone 1.1.2:** Identify scope and initiate procurement and/or hiring process for support contractors, agency staff, community-based organizations (CBOs), and other critical entities using review criteria in line with established best practices for equitable and inclusive hiring, procurement, and engagement activities.

**Deliverable 1.1.1:** Present a finalized project management plan including team members and organizations, roles and responsibilities, and identified areas for growth and augmentation in hiring and contracting, including equity-based criteria proposed for use in the selection of any subcontractors, including but not limited to CBOs.

**Deliverable 1.1.2:** Provide DOE with initial documentation of projected Technical Assistance needs based on the project management plan and timelines agreed to by the Project Team. Technical Assistance needs can include quantitative analyses, technical language drafting assistance, cost and impact analyses, target development, equitable stakeholder engagement and procurement best practices, and other activities requiring specialized expertise from DOE and the National Labs throughout the lifetime of the project. *This will be completed under Subtask 2.2, Staffing and Support Plan.*

**Task 2.0: Benchmarking Ordinance Implementation (M1-M12)**

**Task Summary:** The City of Milwaukee recently adopted a benchmarking ordinance in July of 2024. The first compliance deadline will be in June of 2025, providing initial data on Energy Use Intensity (EUI) in large commercial buildings, as well as a first opportunity for feedback on reporting and compliance processes, usability of software and other support tools, and on the role and efficacy of the commercial buildings help desk and resource center.

**Subtask 2.1: Launch Benchmarking Help Desk and Resource Center**

**Milestone 2.1.1:** Procure consultant to launch and operate the Commercial Buildings/Benchmarking Help Desk and Resource Center.



**Milestone 2.1.2:** Develop a plan for the benchmarking help desk to expand into a BPS help desk following BPS adoption.

**Milestone 2.1.3:** ECO to draft job descriptions for the BPS Coordinator, Community Outreach Coordinator, Metrics & Milestones Manager, and Suburban Energy Coordinator and begin the recruitment and hiring process for those positions.

**Deliverable 2.1:** Provide an overview to DOE of the benchmarking help desk staffing, operational strategy, and plan for expansion under a BPS.

**Subtask 2.2: Benchmarking Reporting and Compliance**

**Milestone 2.2.1:** Reporting by covered buildings under the benchmarking ordinance is complete and the number of respondents is measured.

**Deliverable 2.2:** Provide an overview to DOE on compliance rates under the benchmarking policy and discuss lessons learned, identified areas for improvement, and other items relevant to the development of a BPS policy and its implementation.

**Task 3.0: BPS Program Plan (M1-M12)**

**Task Summary:** Task is designed to build a comprehensive plan for the adoption, implementation, and enforcement of the proposed BPS, including a community benefits plan (CBP) and a compliance plan to report the rate of compliance each year following the effective date of the adopted policy. The BPS Program Plan includes adoption, compliance, and enforcement activities as well as planning around staffing, implementation, capacity building, and workforce development efforts.

**Subtask 3.1: Adoption Plan (M1-M9)**

**Milestone 3.1.1:** Outline Rulemaking Process (as applicable), including a detailed description of key areas of focus to be covered in rulemaking and/or policy development.

**Milestone 3.1.2:** Timeline established to align rulemaking and/or implementation process with technical assistance requests and needs, critical milestones and inflection points in the rulemaking/policy adoption process, and other scheduling information as the team works toward defining and presenting a BPS for passage.

**Deliverable 3.1:** Completed Adoption Plan presented to DOE

**Subtask 3.2: Staffing and Support Plan (M1-M6)**

**Milestone 3.2.1:** Transitional Strategy – engage with external organizations and partner agencies to identify staffing and workforce needs that will arise in the transition to the implementation phase of the BPS. Internal administrative needs as well as external compliance and enforcement needs should be clearly addressed. Establish long-term staffing plan to ensure durability of capacity. This will include



hiring a BPS Coordinator, Community Outreach Coordinator, Milestones & Metrics Manager and Suburban Energy Coordinator to the ECO staff.

**Milestone 3.2.2:** Technology Support and Data Management – Identify and describe the technology and software necessary to administer the BPS through effective data management, customer relationship management, and other administrative workflow requirements.

**Milestone 3.2.3:** Technical Assistance Timelines – Identify and describe critical technical assistance needs such as building energy modeling, building stock analyses, BPS administration and reporting software, or other specialized assistance required to support the successful adoption, implementation, and enforcement of the BPS. Specific needs and requests should be clearly articulated and described in terms of deliverables, timing of need, intended use, and desired outcome. This component will build on Deliverable 1.1.2.

**Deliverable 3.2:** Completed Staffing and Support Plan presented to DOE

**Subtask 3.3:** Implementation, Compliance, and Enforcement Plan (M1-M9)

**Milestone 3.3.1:** Detailed outline designing the mechanisms internal and external to the jurisdiction that will ensure successful implementation of the BPS through workforce training, capacity building, project implementation, etc. as well as the determination of compliance and enforcement processes for non-compliant buildings.

**Milestone 3.3.2:** Develop a preliminary engagement and education strategy focusing on labor and industry organizations to create a representative workforce by training professionals from the communities to be impacted.

**Deliverable 3.3:** Completed Implementation, Compliance, and Enforcement Plan presented to DOE

**Subtask 3.4:** Preliminary Stakeholder and Community Benefits Plan (M1-M9)

**Milestone 3.4.1:** City of Milwaukee procures and hires a consultant to support a comprehensive BPS Stakeholder and Community Engagement Process.

**Milestone 3.4.2:** Engagement Strategy – Develop a preliminary strategy for engaging with J40 Census Tract communities, building trades and unions, and community based organizations.

**Milestone 3.4.3:** Stakeholder Advisory Committee – Create a stakeholder advisory committee with a diverse representation of local organizations representing communities such as affordable housing sector, environmental/energy justice groups, public health, public schools, etc.

**Deliverable 3.4:** Preliminary Stakeholder and Community Benefits Plan presented to DOE

**Subtask 3.5:** Preliminary Workforce Development Strategy (M3-M12)



**Milestone 3.5.1:** Identify critical stakeholders, partner organizations, and funding sources investing in Milwaukee’s clean energy and decarbonization workforce development efforts.

**Milestone 3.5.2:** Develop a strategy for workforce development meeting the needs of all federal clean energy programs engaged in Milwaukee and ensuring complementary efforts to maximize impact.

**Deliverable 3.5:** Preliminary Workforce Strategy finalized and approved by all federal agencies and funders involved, providing clearance for Milwaukee to implement the plan in project out-years.

**Budget Period 1 Go/No-Go Decision Point: Q4 2025**

Milwaukee presents the following for DOE review and agreement to ensure alignment with agency goals and priorities including but not limited to statutory requirements and Justice40 priorities:

- 1) Completed BPS Program Plan, including the Preliminary Stakeholder and Community Benefits Plan and Preliminary Workforce Development Strategy.
- 2) Documentation is provided to DOE detailing the reporting and compliance results of the benchmarking ordinance as well as the resources available to building owners to support compliance efforts.

**Budget Period 2 – BPS Development and Adoption (M13-M36):** Given the nature of IRA Section 50131, the implementation and enforcement of an innovative code, such as a building performance standard, depends on the BPS first being adopted. The second budget period, BPS Development and Adoption, will focus on ensuring that an equitable and inclusive BPS is developed alongside community and stakeholder engagement processes that will yield equitable implementation with significant savings.

**Task 4.0: Community and Stakeholder Engagement for BPS Development**

**Task Summary:** Begin community and stakeholder engagement meetings and events, building from the preliminary stakeholder engagement strategy to a more comprehensive strategy; establish technical and community advisory boards, and other identified engagement activities, events, and organizations listed below. Budget Period 2 should incorporate technical conversations with stakeholders, exploration of the consequences of the BPS under development on disadvantaged communities and informal economies, and begin the effort of community-identification of equity priority buildings.

**Subtask 4.1:** Establish Technical Advisory Board and Community Task Force (M13-M24)

**Subtask Summary:** Task will formalize stakeholder engagement efforts in line with policy development and community benefits plan goals and requirements. The creation of a representative Community Task Force and Technical Advisory Board will be key components in this task that will carry activities through project out-years.





**Milestone 4.1.1:** Develop and finalize structure and quantity of the Community Task Forces and Technical Advisory Boards. Details should include number of members, desired representation from specific communities, organizations, and other stakeholder groups, proposed scope and operational timeline per established group or committee, and desired outcomes each will provide.

**Milestone 4.1.2:** Begin recruitment of members to serve on the proposed task forces and advisory boards, identify mechanisms for compensation of participants where appropriate and necessary, with particular focus on ensuring alignment with the stakeholder and community benefits plan.

**Milestone 4.1.3:** Kick off meetings for at least one community task force and one technical advisory board are held and a plan is established for regular cadence of engagement with buy-in from members on the proposed action plan and scope.

**Deliverable 4.1:** Present the structure of the task forces, recruitment strategies and timelines, and the final makeup of the established bodies alongside details of scope, desired outcomes, and other critical activities each group is to undertake.

**Subtask 4.2:** Comprehensive Stakeholder Engagement for BPS Development ([M13-M24](#))

**Subtask Summary:** Facilitate a public facing campaign, including outreach and informative events, as well as public hearings and more detailed conversations to inform the development of the BPS and ensure that community priorities and benefits are being delivered. Tenant protections, including allowable cost recovery, eviction protections, minimizing disruptions during retrofits, displacement during construction support, and more should be considered and discussed with the community.

**Milestone 4.2.1:** Add to the Preliminary Engagement Strategy with support from consultant, including the creation of constructive feedback loops, representative participation, and compensation strategies where needed. Strategy will include how engagement and feedback will be operationalized or incorporated into decision-making.

**Milestone 4.2.2:** Develop a strategy for periodic engagement with stakeholders and community groups on specific topics that are key to the development of the BPS.

**Milestone 4.2.3:** Enabling Persistent Engagement – Outline a plan for the lifetime of the project, and beyond, that establishes trust-building relationships with historically marginalized communities and disadvantaged communities to be impacted by the BPS. Provide a strategy for how those activities will continue throughout the project lifetime, resulting in community/stakeholder champions.

**Milestone 4.2.4:** Prioritization Analysis and Education – The Stakeholder and Community Benefits Plan will be expanded to include prioritization and benefit analysis of a BPS to determine the types of buildings, as well as other relevant parties that will benefit from BPS (tenants, workforce, etc.).



**Milestone 4.2.5:** J40 Technical Assistance Program - Establish and implement a strategy for providing technical assistance specifically for J40 communities and under resourced groups (affordable housing, senior centers, public schools, etc.), as well as guidance to jurisdictions on public engagement.

**Milestone 4.2.6:** Host at least one meeting per topic area identified in Milestone 4.4.2 or 6 meetings for feedback, whichever is greater.

**Deliverable 4.2:** Present a summary of the feedback collected on the BPS, how the policy development pivoted, and how the feedback is projected to be represented in the final policy language proposed for adoption.

**Subtask 4.3:** Community Engagement for Equity Priority Buildings

**Subtask Summary:** Undertake a community-led process to identify equity priority buildings.

**Milestone 4.3.1:** With the support of community advisory groups, identify priority communities for research and engagement, and the resources and support needed to enable those communities to identify priority buildings.

**Milestone 4.3.2:** Host meetings with identified priority communities to collect input on priority buildings.

**Milestone 4.3.3:** Conduct follow-up meetings to report back to those communities on which buildings are selected to be equity priority buildings under the proposed BPS and why.

**Deliverable 4.3:** Present a summary of the approach, the feedback collected, decisions made, and the resulting selection of equity priority buildings.

**Subtask 4.4:** Stakeholder Engagement for Workforce Training and Development

**Subtask Summary:** Building on efforts begun during the City of Milwaukee's Cream City Climate Challenge decarbonization pilot program and the Preliminary Workforce Development Strategy, the City of Milwaukee will continue working with labor unions and industry organizations, schools and institutes of higher education, community colleges, and other community development organizations to build and train a representative workforce commensurate with the task of implementing the BPS across the entirety of the covered building stock.

**Milestone 4.4.1:** Host at least one event per month engaging with industry professionals, critical partner organizations, utilities and their program implementers, third party service providers, and advocacy organizations to recruit and train new professionals representing the communities being served.

**Milestone 4.4.2:** Develop an educational curriculum with the endorsement and support of labor, industry, and community organizations that contains sufficient and necessary training and educational material for new recruited professionals to successfully support building owners in complying with the BPS.

**Deliverable 4.4:** Present event summaries and an overview of the educational curriculum to DOE for review.



## **Task 5.0: BPS Development (M6-M24)**

**Task Summary:** Implement the BPS Program Plan. Energy and/or emissions targets for covered buildings must be developed in a way that is representative of the covered building stock and provides for ongoing mechanisms for updating targets as additional data and information is collected through the compliance process. Alternative compliance pathways must be developed for buildings that are not able to meet the traditional performance based pathway and compliance and enforcement mechanisms must be detailed to determine whether and how buildings meet a given compliance pathway or what happens if they are unable to meet a compliance pathway. Conditions for exceptions or adjustments for various reasons including timing, finances, or other extenuating circumstances must be included alongside alternate compliance pathways, equity priority buildings considerations, and further analysis of the energy/emissions impacts of the developed rules and regulations. The BPS must be measurable, verifiable, and enforceable and deliver energy savings sufficient to meet statutory requirements.

### **Subtask 5.1: Building Stock Analysis**

**Milestone 5.1.1:** Baseline Building Stock Analysis – the starting point for the building stock covered by the BPS is clearly outlined in terms of building energy and emissions performance from a baseline year.

**Milestone 5.1.2:** Covered Buildings List – complete and provide a covered buildings list based on the details of the BPS policy requirements. Approximations should be provided, where appropriate, identifying the compliance pathway each building is likely to pursue.

**Milestone 5.1.3:** Equity Priority Buildings – develop criteria for a Technical Assistance Program that includes identifying and including Equity Priority Buildings in the Covered Buildings List that reflect local community-based socioeconomic and environmental needs and priorities.

**Deliverable 5.1:** The completed building stock analysis is presented and provided to DOE, including the covered buildings list, identified equity priority buildings, and the framework used to identify both sets of buildings. The process should demonstrate a community-driven approach to identifying equity priority buildings and outline the priorities identified by those communities and the needs that will be addressed to ensure those buildings benefit from the BPS.

### **Subtask 5.2: Performance and Metrics**

**Milestone 5.2.1:** Performance pathway targets are determined for covered buildings in line with best practices for BPS analysis and target setting.

**Milestone 5.2.2:** Alternative compliance pathways are identified and the reporting requirements/pathways required for buildings to be successful in pursuing these pathways are detailed. These specifications include but are not limited to identification of software and reporting templates, prescriptive measures, or



other alternative compliance pathway requirements, provided that the estimated energy savings do not reduce the ability of the BPS to meet the established equivalent or greater energy savings requirements of the grant.

**Milestone 5.2.3:** Metrics are chosen and confirmed for all compliance pathways.

**Deliverable 5.2:** Present alternative compliance pathways and all identified metrics to be used in determining compliance, as well as any supporting resources such as reporting tools or software, to DOE. Demonstrate that the reporting processes are accessible to under resourced buildings and disadvantaged communities, support is in place for buildings that need it, and what proportion of buildings are likely to proceed down each compliance pathway provided.

### **Subtask 5.3: Rules & Regulations**

**Milestone 5.3.1:** Scope for the BPS Task Force is defined, and a timeline is set for developing complete rules and regulations with periodic opportunities for feedback from stakeholders and community members.

**Milestone 5.3.2:** Draft of rules and regulations are shared with DOE for review and initial analysis in preparation for the Go/No-go decision point.

**Deliverable 5.3:** Completed rules and regulations to be included with the BPS ordinance when adopted and signed by the Mayor.

### **Task 6.0: Workforce Training and Development (M6-M24)**

**Task Summary:** This task is designed to continue workforce training, development, and capacity building efforts early in the project and enable long term planning around project pipelines, technology needs, and skills development to be foundational to the implementation effort. Developing a representative workforce in line with the communities identified as equity priority communities or that have higher concentrations of equity priority buildings is core to the success of this effort.

#### **Subtask 6.1: Staffing and Capacity Building**

**Milestone 6.1.1:** Internal Staffing Plan – Present a plan to DOE detailing the roles and responsibilities for positions internal to the jurisdiction in both the implementing office or agency and partner offices and agencies. These positions include but are not limited to full time equivalents (FTEs), interns, fellows, and apprentices.

**Milestone 6.1.2:** External Capacity Building Plan – Present a plan to DOE detailing the roles and needs for supporting organizations including but not limited to: labor organizations, unions, community based organizations, utility program implementers, energy service providers, building trades organizations, contractors, and NGOs. Include an actionable strategy for building that capacity with a workforce representative of the communities being served, along with a timeline and steps to be taken to fill those positions. Jobs created should be paid a living wage, or at least \$40,000 per year.



**Milestone 6.1.3:** Continue the Resilience Ambassadors program in partnership with community based organizations to serve as trusted messengers in underserved communities to better communicate the availability of supportive programs and resources and assist community members with accessing those programs and resources.

**Milestone 6.1.4:** Continue to support the Green Jobs Coordinator to develop and lead the Green Jobs Accelerator to:

- Build education and promotion program for green jobs and careers related to implementation of BPS
- Clarify training pathways
- Build skills through subsidized training
- Identify transitional jobs with career ladders
- Identify community benefits agreements for public projects
- Promote Black and Brown business development

**Deliverable 6.1:** Present internal and external capacity building plans as well as a scope, timeline, and strategic overview of the Resilience Ambassadors program. The deliverable should address goals in the community benefits plan and align with Justice40 priorities, ensuring that benefits are reaching disadvantaged communities across the city. The strategic outlook should also include discussion around how to ensure that these programs, resources, and capacity additions are persistent and sustainable long term solutions.

**Subtask 6.2:** Equity Considerations in Capacity Building

**Milestone 6.2.1:** Identify metrics to input into the goals of the Green Jobs Accelerator, using key considerations with opportunities for disadvantaged communities to be represented and the provision of feedback, and development of jobs and workforce capacity in support of the BPS program.

**Milestone 6.2.2:** Identify and develop impact metrics measured specifically for Justice40 census tracts to track outreach, engagement in retrofit discussions, and project impact. Metrics will reflect desired outcomes expressed by these communities, and result in meaningful benefits to households and businesses within Justice40 communities.

**Deliverable 6.2:** Present a representative workforce strategy to DOE that details metrics and key considerations for building a representative workforce designed to benefit Justice40 communities and those disadvantaged communities, buildings, and equity priority buildings.

**Task 7.0: BPS Administration**



**Task Summary:** From the point of adoption of the BPS, Milwaukee will stand up an administrative effort to implement the BPS across the jurisdiction. This can include software procurement and customer relationship management tools, help desks, communications and outreach efforts, and more.

**Subtask 7.1:** Adoption of a Building Performance Standards Ordinance by the City of Milwaukee Common Council and Mayor.

For both options below, the feedback collected through community and stakeholder engagement processes should be identified in the adopted language when presented to DOE. For key takeaways presented in deliverables from the engagement tasks that are not subsequently included in the adopted language, an explanation for that decision and outcome must be provided.

**Option 1:** Law passed with sufficient detail such that the BPS is able to be implemented without further rulemaking processes. The Go/No-go is satisfied following a DOE analysis of the adopted BPS language to ensure that the equivalence requirement is met for the category of equivalent energy savings to the latest model energy code.

**Option 2:** Both Part 1 and Part 2, below, must be satisfied to meet the requirements of this option.

**Part 1:** Statute authorizing the creation of a BPS (or providing the authority to adopt a BPS) and/or the required law establishing the BPS itself is passed by the legislative body.

**Part 2:** BPS rules and regulations are completed, including targets, trajectories, compliance pathways, enforceability, and other attributes as necessary such that the BPS is able to be implemented without further rulemakings. The Go/No-go is satisfied following a DOE analysis of the adopted BPS language to ensure that the equivalence requirement is met for the category of equivalent energy savings to the latest model energy code

**Budget Period 2 Go/No-Go Decision Point: Q4 2027**

Milwaukee's BPS ordinance is adopted in line with requirements under one of the options outlined in Subtask 7.1 and satisfies the requirements for equivalent energy savings in line with IRA Section 50131 and the terms of the Award. Provide details of at least 12 external engagement events with community stakeholders, 6 of which should be focused on disadvantaged communities. Summaries of resources and information provided to attendees, discussions, key takeaways, and actions taken by the Project Team in response to those takeaways should be included.

**Budget Period 3 – BPS Adoption and Implementation (M37-M48):** – Following the adoption of the BPS, Milwaukee, its partners, and its community organizations need to rapidly



ramp up to provide adequate support to constituents including building owners, occupants, tenants, and the workforce to ensure that appropriate interventions can be made in a timely manner to all covered buildings.

**Subtask 7.2: BPS Helpdesk**

**Milestone 7.2.1:** Expand the Commercial Buildings Help Desk and Resource Center to also support buildings and communities under the adopted building performance standard.

**Milestone 7.2.2:** Implement the Equity Priority Buildings Technical Assistance Program, coordinating with the Resilience Ambassadors and other available resources where applicable and appropriate.

**Deliverable 7.2:** Demonstration of help desk functionality and an overview of the Equity Priority Buildings Technical Assistance Program along with articulation of desired outcomes and metrics used to determine effectiveness and reach of the program.

**Subtask 7.3: Workforce Training and Development**

**Milestone 7.3.1:** Create an online resource hub with a comprehensive library of content to answer frequently asked questions about benchmarking and BPS, including but not limited to: a guide that details rules and regulations, videos with step-by-step instructions on how to comply, policy compliance checklists and pathway selection tools, information on rebates and other financial incentives and resources, case studies, and more.

**Milestone 7.3.2:** Develop a curriculum for internal city staff on the impacts of a BPS and how to identify and mitigate risks throughout the policy implementation lifecycle, with particular consideration given to preserving community integrity, maintaining affordability, and minimizing displacement.

**Milestone 7.3.3:** Develop a curriculum for external program implementers and buildings professionals to support the timely and effective implementation of the BPS, including building upgrades, audits, and other building interventions as well as support for reporting, tenant and occupant education, available incentives and financial resources, and how to return to communities and report out on progress.

**Deliverable 7.3:** Milwaukee will present a demonstration of the resource hub and an overview of both internal and external curricula for workforce training and development for review.

**Budget Period 3 Go/No-Go Decision Point: Q4 2028**

The commercial buildings help desk and resource center is expanded to support building owners' compliance with the BPS. The commercial buildings help desk and resource center has 18-24 months of user engagement data to present to DOE for review. The workforce training program has completed at least two annual trainings for in-house



staff and contractors and four trainings for industry professionals in support of increasing workforce capacity through jobs paying living wage or greater.

**Budget Period 4 – BPS Compliance and Enforcement (M49-M72):** – Following the implementation phase, Milwaukee will enter its first reporting year at the end of a compliance cycle. Compliance status will be determined for all covered buildings and appropriate enforcement action, as outlined in the enforcement plan, will be initiated with those buildings that are deemed non-compliant according to the adopted policy. Milwaukee will work to establish a long-term, sustainable model for ongoing BPS implementation, compliance, and enforcement beyond the end of the grant term.

**Task 8.0:** BPS Compliance and Enforcement (M49-M72)

**Task Summary:** This task is designed to facilitate the completion of the first compliance cycle under Milwaukee’s BPS. The work will include ensuring that buildings reported data where appropriate, pursued alternative compliance pathways where appropriate, and that all buildings are evaluated and deemed to be either compliant or noncompliant. For those buildings that are deemed noncompliant, enforcement actions will be taken by the City.

**Subtask 8.1:** Determining Compliance and Non-Compliance for Covered Buildings

**Milestone 8.1.1:** Compliance data is collected for all compliance pathways (performance path and alternative compliance pathways) and compliance rates are determined by pathway.

**Milestone 8.1.2:** Each building is provided with a status of “compliant” or “noncompliant” based on the materials submitted to Milwaukee corresponding with their compliance pathway. If exceptions are made, those are noted with explanations for why they are provided.

**Milestone 8.1.3:** Buildings that are deemed “compliant” are notified and provided with a deadline for the reporting period of the subsequent compliance cycle. Buildings that are deemed “noncompliant” are entered into an enforcement process and notified of this proceeding.

**Deliverable 8.1:** Report to DOE detailing the following figures in line with the reporting template:

- 1) The number of covered buildings by compliance pathway
- 2) The number of covered buildings by compliance pathway with data submitted
- 3) The number of covered buildings by compliance pathway with data submitted that are deemed “compliant”
- 4) The number of covered buildings by compliance pathway with data submitted that are deemed “noncompliant”
- 5) A list of any exceptions provided to buildings along with an explanation of why those exceptions were made





- 6) A breakdown of the outcomes of equity priority buildings and any specific actions taken in order to provide additional support to those facilities and communities that require it for benefits to be realized.

**Subtask 8.2: Enforcement Actions for Noncompliant Buildings**

**Milestone 8.2.1:** Description of the enforcement process for buildings deemed noncompliant, including timeline, penalties, and/or relevant civil proceedings.

**Milestone 8.2.2:** Proceed through the enforcement process with at least 50% of the buildings deemed noncompliant and provide recommendations for adjustments or changes to be made for future compliance cycles.

**Deliverable 8.2.** Provide technical assistance and legal counsel for compliance for underserved communities and buildings that receive public assistance.

**Deliverable 8.2:** Provide a report or presentation to DOE on the enforcement process, demonstrating the number of buildings that required enforcement actions, the result of those actions for the 50% or more covered in Milestone 7.2.2, and the remaining buildings to face enforcement action following this deliverable, if applicable. Discuss proposed changes for future enforcement actions that will improve outcomes for both Milwaukee and its covered buildings and communities.

**Task 9.0: Ongoing Implementation and Periodic BPS Modernization**

**Task Summary:** The BPS is a long term policy mechanism designed to decarbonize the building stock in Milwaukee. Technological, socioeconomic, and other changes may impact the ability of covered buildings to comply with the program requirements. The priorities held by utilities or state or national governments may change, as the climate changes, the environmental hazards or risks faced by buildings in Milwaukee may change, and other unforeseen circumstances may require adjustments of the BPS program. This task is designed to consider those risks and needed adjustments and manage them to preserve the integrity of the program and ensure that the long term savings and benefits of the program are delivered to communities across the city.

**Subtask 9.1: Processes for Incorporating Programmatic Changes**

**Milestone 9.1.1:** Process for proposing changes to rules and regulations, adjusting incentives, alternate compliance pathways, and other

**Milestone 9.1.2:** Process for updating performance pathway targets based on progress of the building stock and results of field studies to validate implementation of alternate compliance pathway requirements

**Deliverable 9.1:** Finalized processes are presented to DOE to demonstrate long term viability of the BPS and readiness to address changing needs and challenges in the decarbonization process.



**Task 10.0: Ongoing Workforce Training and Stakeholder Engagement**

**Subtask 10.1:** Ongoing stakeholder and community engagement, support for equity priority buildings, and implementation needs.

**Subtask 10.2:** Ongoing workforce training in response to developing community needs to ensure a well trained workforce and sufficient capacity to implement and enforce the BPS in a timely and effective manner.

**Milestone 10.1:** Demonstration of ongoing workforce development, including measure of the number of jobs created and summaries of the stakeholder and community events where information is provided to convey benefits and impact and feedback is received to prompt programmatic improvements.

**Deliverable 10.1:** Report on how at least 40% of funding flowed to Justice40 communities. Report submitted to DOE should include measurement of decrease in energy burden, increase in housing quality, durability, and availability, and increased energy resilience, as well as any additional priority areas specified in the FOA or by the Project Team.

**Project Close Out: Q4 2030**

The conclusion of the project will demonstrate that Milwaukee is on track to reach its GHG reduction goal through the adoption and implementation of a BPS with energy savings equivalent to ASHRAE 90.1-2019, according to the terms of the Funding Opportunity. The City of Milwaukee will provide a compliance and enforcement summary accounting for at least 95% of the covered buildings under the BPS and outline projected activities to be carried out beyond the conclusion of the project to ensure persistent savings and ongoing benefits reaching communities across Milwaukee. A final report will detail the estimated energy savings realized to date, measured increase in the workforce through skilled, well-paying living wage jobs filled by representatives of priority communities across the city, and demonstrate that at least 40% of benefits went to disadvantaged communities.

## **D. Project Management and Reporting**

Reports and other deliverables will be provided in accordance with the Federal Assistance Reporting Checklist following the instructions included therein.

Additional deliverables as indicated in the task/subtask descriptions include the following:

### ***Year 1 (2025) SMART Milestones***

#### **Project Milestones:**

- Finalize the project management plan.



- Identify scope and initiate procurement and/or hiring process for support contractors, agency staff (BPS Coordinator, Community Outreach Coordinator, Metrics & Milestones Manager, and Suburban Energy Coordinator), community-based organizations, and other critical entities. Also, identify Technical Assistance needs and communicate those to the Department of Energy (DOE).
- Launch Commercial Building Benchmarking Help Desk and Resource Center, and develop a plan for the Help Desk to support Building Performance Standard compliance.
- BPS Adoption Plan completed and presented to DOE.
- Reporting by covered buildings under the benchmarking ordinance is complete and compliance rates are reported to DOE.
- Completed Implementation, Compliance, and Enforcement Plan presented to DOE.
- **CBP Milestones:**
  - Begin to engage with external organizations and partner agencies to identify staffing and workforce needs that will arise in the transition to the implementation phase of the BPS.
  - Develop a preliminary engagement and education strategy focusing on labor and industry organizations to create a representative workforce by training professionals from the communities to be impacted.
  - Create a stakeholder advisory committee with a diverse representation of local organizations representing communities such as the affordable housing sector, environmental/energy justice groups, public health, public schools, etc.
  - City of Milwaukee procures and hires a consultant to support a comprehensive BPS Stakeholder and Community Engagement Process.
  - Preliminary Stakeholder and Community Benefits Plan presented to DOE, which includes a preliminary strategy for engaging with J40 Census Tract communities, building trades and unions, and community-based organizations.
  - Preliminary Workforce Development Strategy, focusing on the decarbonization workforce but including all federal clean energy programs engaged in Milwaukee, is finalized and approved.

### ***Year 2 (2026) SMART Milestones***

#### **Project Milestones:**

- Establish Technical Advisory Board and Community Task Force for BPS development, with at least one kick-off meeting completed for each.
- Comprehensive Stakeholder and Community Engagement for BPS Development, including at least 12 meetings, at least 6 of which are focused on engaging stakeholders from disadvantaged communities.



- Implement the BPS Program Plan, including the development of a building stock analysis, covered buildings list, and likely equity priority buildings, as well as BPS rules and regulations, and compliance pathways. The BPS will be measurable, verifiable, and enforceable, and deliver energy savings sufficient to meet statutory requirements.

**CBP Milestones:**

- Add to the Preliminary Engagement Strategy with support from consultant, including the creation of constructive feedback loops, representative participation, and compensation strategies where needed.
- Outline a plan to enable persistent engagement, that establishes trust-building relationships with historically marginalized and disadvantaged community members to be impacted by the BPS. Provide a strategy for how those activities will continue throughout the project lifetime, resulting in community/stakeholder champions.
- Expand the Stakeholder and Community Benefits Plan to include a prioritization and benefit analysis of a BPS to determine the types of buildings, as well as other relevant parties that will benefit from BPS (tenants, workforce, etc.).
- Establish and implement a strategy for providing technical assistance specifically for J40 communities and under resourced groups (affordable housing, senior centers, public schools, etc.).
- Stakeholder Engagement for Workforce Training and Development: Host at least one event per month engaging with industry professionals, critical partner organizations, utilities and their program implementers, third party service providers, and advocacy organizations to recruit and train new professionals representing the communities being served.
- With the support of community advisory groups, identify priority communities for research and engagement, and the resources and support needed to enable those communities to identify priority buildings.
- Host meetings with identified priority communities to collect input on equity priority buildings, and conduct follow-up meetings.
- Develop an educational curriculum with the endorsement and support of labor, industry, and community organizations that contains sufficient and necessary training and educational material for new recruited professionals to successfully support building owners in complying with the BPS.
- Continue the Resilience Ambassadors program in partnership with community-based organizations to serve as trusted messengers in underserved communities to better communicate the availability of supportive programs and resources, and assist community members with accessing those programs and resources.
- Continue to support the Green Jobs Coordinator to develop and lead the Green Jobs Accelerator. This will include identifying and developing impact metrics to track outreach and project impact in Justice40 census tracts.



- Present a representative workforce strategy to DOE that details metrics and key considerations for building a representative workforce designed to benefit Justice40 communities and those disadvantaged communities, buildings, and equity priority buildings.

### ***Year 3 (2027) SMART Milestones***

#### **Project Milestones:**

- Adoption of a Building Performance Standards Ordinance by the City of Milwaukee Common Council and Mayor.
- Expand the Commercial Buildings Help Desk and Resource Center to also support buildings and communities under the adopted building performance standard.
- Develop a curriculum for internal city staff on the impacts of a BPS and how to identify and mitigate risks throughout the policy implementation lifecycle, with particular consideration given to preserving community integrity, maintaining affordability, and minimizing displacement.

#### **CBP Milestones:**

- Implement the Equity Priority Buildings Technical Assistance Program, coordinating with the Resilience Ambassadors and other available resources where applicable and appropriate.
- Develop a curriculum for external program implementers and buildings professionals to support the timely and effective implementation of the BPS, including building upgrades, audits, and other building interventions as well as support for reporting, tenant and occupant education, available incentives and financial resources, and how to return to communities and report out on progress.
- Continue collaboration with CBO partners to increase the recruitment of individuals from disadvantaged communities into workforce training programs to ensure a well-trained workforce and sufficient capacity to implement and enforce the BPS, as well as to make buildings more efficient and decarbonize them so that they meet BPS targets.

### ***Years 4 and 5 (2028 and 2029) SMART Milestones***

#### **Project Milestones:**

- BPS Compliance data is collected for all compliance pathways (performance path and alternative compliance pathways), compliance rates are determined by pathway, and compliance data are shared with the DOE on an annual basis.

#### **CBP Milestones:**



- Stakeholder and community engagement continues with meetings occurring on a quarterly basis to provide support and seek feedback from owners of covered buildings, especially for owners of equity priority buildings. Challenges, benefits, and other topics discussed in meetings are reported to the DOE.
- Support for workforce efforts continue, as well, through meetings occurring twice a year with stakeholders, including CBOs, workforce training program providers, and unions to discuss the successes and challenges to increasing the decarbonization workforce, especially recruiting new workforce members from underserved communities.
- Demonstration of ongoing workforce development, including reporting the number of individuals newly trained in decarbonization technologies, measuring the number of jobs created, and summaries of the stakeholder and community events where information is provided to convey the benefits and impact of the work. Relevant information and statistics are reported to DOE twice a year, including feedback received to prompt programmatic improvements.

### ***Year 6 (2030) SMART Milestones***

#### **Project Milestones:**

- BPS Compliance data is collected for all compliance pathways (performance path and alternative compliance pathways), compliance rates are determined by pathway, and compliance data are shared with the DOE on an annual basis.
- Description of the enforcement process for buildings deemed noncompliant, including timeline, penalties, and/or relevant civil proceedings.
- Proceed through the enforcement process with at least 50% of the buildings deemed noncompliant and provide recommendations for adjustments or changes to be made for future compliance cycles.
- Develop a process for proposing changes to rules and regulations, adjusting incentives, alternate compliance pathways, and other changes.

#### **CBP Milestones:**

- Provide technical assistance and legal counsel for compliance for underserved communities and buildings that receive public assistance.
- Provide a report to DOE on the enforcement process and discuss proposed changes for future enforcement actions that will improve outcomes for both Milwaukee and its covered buildings and communities.
- Stakeholder and community engagement continues with meetings occurring on a quarterly basis to provide support and seek feedback from owners of covered buildings, especially for owners of equity priority buildings. Challenges, benefits, and other topics discussed in meetings are reported to the DOE.



- Support for workforce efforts continue, as well, through meetings occurring twice a year with stakeholders, including CBOs, workforce training program providers, and unions to discuss the successes and challenges to increasing the decarbonization workforce, especially recruiting new workforce members from underserved communities.
- Demonstration of ongoing workforce development, including reporting the number of individuals newly trained in decarbonization technologies, measuring the number of jobs created, and summaries of the stakeholder and community events where information is provided to convey the benefits and impact of the work. Relevant information and statistics are reported to DOE twice a year, including feedback received to prompt programmatic improvements.

Report on how at least 40% of funding flowed to Justice40 communities. Report submitted to DOE should include measurement of decrease in energy burden for tenants in multifamily buildings covered by the BPS, increase in housing quality, durability, and availability, increased energy resilience, and workforce members recruited from underserved communities as well as any additional priority areas specified in the FOA or by the Project Team.

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Milestone Summary Table							
<b>Recipient Name:</b>		City of Milwaukee					
<b>Project Title:</b>		City of Milwaukee Benchmarking and Building Performance Standards Policy Development and Implementation					
Task Number	Subtask Title	Milestone Type	Milestone Number	Milestone Description	Milestone Verification Process	Anticipated Date	Anticipated Quarter
<b>Task 1: Launch, Stakeholder Engagement, and Resource Center</b>							
1.1	Project Kick-off and Finalize Project Management Plan	Milestone	1.1.1	Host kick-off meeting and finalize the project management plan	DOE Attends meeting	M1	Q1
1.1	Project Kick-off and Finalize Project Management Plan	Milestone	1.1.2	Identify scope and initiate procurement and/or hiring for various roles	RFP and Position Descriptions are Published	M1-2	Q1
1.1	Project Kick-off and Finalize Project Management Plan	Deliverable	1.1.1	Present finalized PMP to DOE	DOE reviews project management plan for approval	M2	Q1
1.1	Project Kick-off and Finalize Project Management Plan	Deliverable	1.1.2	Initial technical assistance needs documentation	DOE reviews projected needs and will return with questions, if applicable	M2	Q1
1.1	Community Benefits Plan	CBP Deliverable	1.1.3	Publish final community benefits plan	Published via City	M9	Q3
<b>Task 2.0: Benchmarking Ordinance Implementation</b>							
2.1	Launch Commercial Buildings Help Desk	Milestone	2.1.1	Procure contractor or hire staff to launch and operate the Help Desk	DOE to review procurement requirements	M3	Q1
2.1	Launch Commercial Buildings Help Desk	Milestone	2.1.2	Present a plan for the eventual expansion of the Help Desk to support a BPS	DOE to review completed plan	M4	Q2
2.1	Launch Commercial Buildings Help Desk	Milestone	2.1.3	ECO to begin hiring process for BPS, Community Outreach and Suburban Energy Coordinators, and Metrics & Milestones Manager	DOE to review job descriptions and provide feedback and/or approve	M3	Q1
2.1	Launch Commercial Buildings Help Desk	Deliverable	2.1	Submit a strategic plan for the staffing and operation of the Help Desk as well as the eventual expansion to support BPS	DOE to review and provide feedback and/or approve	M6	Q2





2.2	Benchmarking Reporting and Compliance	Milestone	2.2.1	Reporting by covered buildings under the benchmarking ordinance is complete	Number of respondents and summary performance statistics provided to DOE	M8	Q3
2.2	Benchmarking Reporting and Compliance	Deliverable	2.2	Provide an overview on compliance rates and lessons learned, identifying areas for improvement, and other items relevant to BPS development and implementation	DOE to review and provide feedback and/or approve	M8	Q3
<b>Task 3: BPS Program Plan</b>							
3.1	Outline rulemaking process	Milestone	3.1.1	Outline provided to DOE	Submission complete	M3	Q1
3.1	Align planned technical assistance needs with rulemaking timeline	Milestone	3.1.2	Schedule provided to DOE for review	DOE to review and accept	M4	Q2
3.1	Completed Adoption Plan	Deliverable	3.1	Adoption plan provided to DOE	DOE to review and accept	M9	Q3
3.2	Transitional Strategy	Milestone	3.2.1	Engagement with external organizations and partner agencies begins	Update provided to DOE on activities	M3	Q1
3.2	Technology Support and Data Management	Milestone	3.2.2	Identify and describe technology and software needs to support BPS administration	Software specification, administrative model and process documentation provided to DOE for review	M7	Q3
3.2	Technical Assistance Timelines	Milestone	3.2.3	Identify and describe technical assistance needs over the lifetime of the project	Work with DOE to further detail and finalize Deliverable 1.1.2	M7	Q3
3.2	Staffing and Support Plan	Deliverable	3.2	Completed Staffing and Support Plan submitted to DOE	DOE to review for approval	M9	Q3
3.3	Outline of implementation and enforcement mechanisms	Milestone	3.3.1	Outlined provided to DOE for review	DOE to review and provide feedback	M6	Q2



3.3	Preliminary Engagement and Education Strategy	CBP Milestone	3.3.2	Outline provided to DOE for review	DOE to review and provide feedback	M6	Q2
3.3	Implementation, Compliance, and Enforcement Plan	Deliverable	3.3	Submitted to DOE for approval	DOE to review and provide feedback and/or approve	M9	Q3
3.4	Preliminary Stakeholder and Community Benefits Plan	CBP Milestone	3.4.1	Draft provided to DOE for review	DOE to review and provide feedback	M9	Q3
3.4	Stakeholder Advisory Committee	CBP Milestone	3.4.2	Overview of committee and representation provided to DOE	DOE to review and ensure alignment with CBP and J40 best practices	M6	Q2
3.5	Preliminary Workforce Development Strategy and coordination	CBP Milestone	3.5.1	Identify critical stakeholders, partner organizations, and funding sources investing in Milwaukee's clean energy and decarbonization workforce development efforts, across all City agencies.	Submit list	M6	Q3
		CBP Milestone	3.5.2	Develop a strategy for workforce development meeting the needs of all federal clean energy programs engaged in Milwaukee and ensuring complementary efforts to maximize impact, including Green Jobs Accelerator scope.	DOE to review and provide feedback	M12	Q4
		CBP Deliverable	3.5	Preliminary Workforce Strategy finalized and approved by all federal agencies and funders involved, providing clearance for Milwaukee to implement the plan in project out-years.	DOE to review completed plan	M8	Q3



BP1	Project and Help Desk Launch	Go/No-Go	BP1	Completed BPS Program Plan including Preliminary Stakeholder and Community Benefits Plan and Preliminary Workforce Development Strategy and benchmarking implementation summary	DOE to review and provide feedback and/or approve	M12	Q4
<b>Task 4.0: Community and Stakeholder Engagement for BPS Development</b>							
4.1	Establish Technical Advisory Board and Community Task Force	Milestone	4.1.1	Finalize structure and quantity of Community and Technical Advisory Entities	Provide summary to DOE	M13	Q5
4.1	Establish Technical Advisory Board and Community Task Force	Milestone	4.1.2	Begin recruitment of members for Advisory Entities	Provide summary of progress and activities to DOE	M15	Q5
4.1	Establish Technical Advisory Board and Community Task Force	Milestone	4.1.3	Kick off meetings for Advisory Entities	Provide summary of progress and activities to DOE	M15	Q5
4.1	Establish Technical Advisory Board and Community Task Force	Deliverable	4.1	Present structure of Advisory Entities, timelines, and additional details to DOE	DOE will review and determine if acceptable	M18	Q6
4.2	Stakeholder Engagement for BPS Development	CBP Milestone	4.2.1	Develop strategy for periodic engagement with stakeholders on key BPS topics. Include creation of feedback loops and how will be incorporated into decision-making	DOE to review and provide feedback and/or approve	M14	Q5
4.2	Stakeholder Engagement for BPS Development	CBP Milestone	4.2.2	Enable Persistent Engagement. Draft Plan to DOE	DOE to review draft and provide feedback and/or approve	M14	Q5
4.2	Stakeholder Engagement for BPS Development	CBP Milestone	4.2.3	Prioritization Analysis and Education. Provide draft plan to DOE as an update to Stakeholder and Community Benefits Plan	DOE to review draft and provide feedback and/or approve	M14	Q5
4.2	Stakeholder Engagement for BPS Development	CBP Milestone	4.2.4	J40 Technical Assistance Program – Establish and implement a strategy to provide TA specifically for J40	DOE to review draft and provide feedback and/or approve	M14	Q5



				communities and under-resourced groups			
4.2	Stakeholder Engagement for BPS Development	CBP Milestone	4.2.5	Host at least one meeting per topic identified in Milestone 4.4.2 with each key stakeholder and community group	DOE to review and provide feedback and/or approve	M13-24	Q7-8
4.2	Stakeholder Engagement for BPS Development	CBP Deliverable	4.2	Present a summary of the feedback collected, how BPS development pivoted, and how feedback is projected to be represented in final policy language.	DOE to review and provide feedback and/or approve	M24	Q8
4.3	Community Engagement for Equity Priority Buildings	CBP Milestone	4.3.1	Identify priority groups for engagement and the resources and support to enable participation	DOE to review and provide feedback and/or approve strategic approach	M19	Q7
4.3	Community Engagement for Equity Priority Buildings	CBP Milestone	4.3.2	Host meetings with identified priority communities to collect input on priority buildings	Provide notes and key takeaways from meetings	M13-22	Q7-8
4.3	Community Engagement for Equity Priority Buildings	CBP Milestone	4.3.3	Follow-up meetings to report back to communities on selected equity priority buildings	Provide notes and key takeaways from meetings	M20-24	Q7-8
4.3	Community Engagement for Equity Priority Buildings	CBP Deliverable	4.3	Summary of the approach, feedback collected, decisions made, and resulting selection of equity priority buildings presented to DOE.	DOE to review and provide feedback and/or approve	M23-24	Q8
4.4	Stakeholder Engagement for Workforce Training and Development	CBP Milestone	4.4.1	Host at least one event per month engaging with industry organizations around recruitment efforts.	DOE to review list of organizations for engagement	M13-24	Q5-8
4.4	Stakeholder Engagement for Workforce Training and Development	CBP Milestone	4.4.2	Develop an educational curriculum with identified	DOE to review list of participants and scope of curriculum	M13-18	Q7



				industry organizations and community organizations			
4.4	Stakeholder Engagement for Workforce Training and Development	CBP Deliverable	4.4	Present summaries of events held and an overview of the developed training curriculum to DOE	DOE to review and provide feedback and/or approve	M24	Q8
<b>Task 5.0: BPS Development</b>							
5.1	Building Stock Analysis	Milestone	5.1.1	Baseline Building Stock Analysis	DOE to review and provide feedback	M20-24	Q7-8
5.1	Building Stock Analysis	Milestone	5.1.2	Covered Buildings List	DOE to review and provide feedback	M20-24	Q7-8
5.1	Building Stock Analysis	CBP Milestone	5.1.3	Equity Priority Buildings	DOE to review and provide feedback	M20-24	Q7-8
5.1	Building Stock Analysis	Deliverable	5.1	Completed Building Stock Analysis	DOE to review and provide feedback and/or accept	M24	Q8
5.2	Performance and Metrics	Milestone	5.2.1	Performance Targets	DOE to review and provide feedback	M20-24	Q7-8
5.2	Performance and Metrics	Milestone	5.2.2	Alternative Compliance Pathways	DOE to review and provide feedback	M22-24	Q8
5.2	Performance and Metrics	Milestone	5.2.3	Finalize Metrics	DOE to review and provide feedback	M24	Q8
5.2	Performance and Metrics	Deliverable	5.2	Presentation of metrics and compliance requirements for all compliance pathways in the BPS.	DOE to review and provide feedback and/or accept	M24	Q8
5.3	Rules and Regulations	Milestone	5.3.1	Set scope and timeline for BPS Task Force	DOE to review and provide feedback	M21	Q7
5.3	Rules and Regulations	Milestone	5.3.2	Draft of rules and regulations	DOE to review and provide feedback	M21-24	Q8
5.3	Rules and Regulations	Deliverable	5.3	Completed rules and regulations	DOE to review and provide feedback and/or accept	M24	Q8
<b>Task 6: Workforce Training and Development</b>							
6.1	Staffing and Capacity Building	Milestone	6.1.1	Internal Staffing Plan	DOE to review and provide feedback	M1-2	Q1



6.1	Staffing and Capacity Building	Milestone	6.1.2	External Capacity Building Plan	DOE to review and provide feedback	M13 - 18	Q5-6
6.1	Staffing and Capacity Building	CBP Milestone	6.1.3	Expand Resilience Ambassadors Program	DOE to review expansion plan and provide feedback	M21	Q7
6.1	Staffing and Capacity Building	CBP Milestone	6.1.4	BPS, Community Outreach, and Suburban Energy Coordinators and Milestones & Metrics Manager Hired	Hiring announcement confirmed	M7-12	Q3-
6.1	Staffing and Capacity Building	CBP Deliverable	6.1	Present internal and external capacity building plans as well as strategic overview of Resilience Ambassadors program.	DOE to review and provide feedback and/or approve	M6 - 12	Q2 – 4
6.2	Equity Considerations in Capacity Building	CBP Milestone	6.2.1	Identify equity metrics and key considerations around developing a representative workforce.	DOE to review and provide feedback	M20 - 24	Q8
6.2	Equity Considerations in Capacity Building	CBP Milestone	6.2.2	Identify and develop metrics specifically for disadvantaged and Justice40 communities to track outreach and engagement and ultimately project impact.	DOE to review and provide feedback	M20 - 24	Q8
6.2	Equity Considerations in Capacity Building	CBP Deliverable	6.2	Present a representative workforce strategy to DOE	DOE to review and provide feedback and/or approve	M24	Q8
<b>Task 7.0: BPS Administration</b>							
7.1	BPS Adoption	Milestone	7.1.1	City of Milwaukee BPS ordinance is adopted by Common Council and Mayor	Adoption via Option 1 or Option 2	M27	Q9
BP2	BPS Development and Adoption	Go/No-go	BP2	Provide details of at least 12 external engagement events with community stakeholders, 6 of which should be focused on disadvantaged communities. Summaries of	DOE to review, conduct a validation analysis for energy savings and other critical BPS attributes according to selected Option.	M36	Q12



				resources and information provided to attendees, discussions, key takeaways, and actions taken by the Project Team in response to those takeaways to be included.  BPS is adopted and the final language demonstrates that the program is measurable, verifiable, and enforceable, and will deliver sufficient energy savings in line with statutory requirements.			
7.2	BPS Helpdesk	Milestone	7.2.1	Expanded the Commercial Buildings Help Desk and Resource Center to support BPS	DOE to review and advise on strategy	M27-30	Q9-10
7.2	BPS Helpdesk	CBP Milestone	7.2.2	Implement Equity Priority Buildings Technical Assistance Program	DOE to review and advise on strategy to ensure alignment with Justice40 goals	M27-30	Q9-10
7.2	BPS Helpdesk	Deliverable	7.2	Demonstration of help desk functionality and overview of EPB TA Program with forecast of outcomes.	DOE to review and provide feedback and/or approve.	M30	Q10
7.3	Workforce Training and Development	CBP Milestone	7.3.1	Create and launch online resource hub	DOE to evaluate resources	M27 - 36	Q9-12
7.3	Workforce Training and Development	Milestone	7.3.2	Develop a curriculum for internal city staff on BPS impacts	DOE to review and provide feedback and/or approve	M27-36	Q9-12
7.3	Workforce Training and Development	Milestone	7.3.3	Develop a curriculum for external program implementers on the impacts of BPS	DOE to review and provide feedback and/or approve	M27-36	Q9-12



7.2	Workforce Training and Development	Deliverable	7.3	Milwaukee will demonstrate the resource hub and provide an overview of both curricula.	DOE to review and provide feedback and/or approve	M36	Q12
BP3	BPS Adoption and Administration	Go/No-Go	BP3	BPS ordinance is adopted. Helpdesk is expanded to support BPS and has with 12-18 months of user statistics; the creation of living-wage jobs in line with BPS implementation is demonstrated through testimonials, data, and ongoing recruitment activities.	DOE to review and provide feedback and/or approve	M48	Q16
<b>Task 8.0: BPS Compliance and Enforcement</b>							
8.1	Determining Compliance and Non-Compliance for Covered Buildings	Milestone	8.1.1	Compliance data collected for all compliance pathways	DOE reviews and validates compliance rate by pathway	M60	Q20
8.1	Determining Compliance and Non-Compliance for Covered Buildings	Milestone	8.1.2	Each building provided with compliance status or issued exceptions with explanations	Notices are sent	M60	Q20
8.1	Determining Compliance and Non-Compliance for Covered Buildings	Milestone	8.1.3	Enforcement proceedings are outlined and initiated for noncompliant buildings	Notices sent and process begins; DOE validates included buildings and reviews the enforcement process	M60	Q20
8.1	Determining Compliance and Non-Compliance for Covered Buildings	Deliverable	8.1	Report to DOE detailing compliance rates.	Metrics submitted to DOE that address at least 95% of the covered buildings	M60	Q20
8.2	Enforcement Actions for Noncompliant Buildings	Milestone	8.2.1	Description of enforcement process for buildings deemed noncompliant	DOE to review and provide feedback and/or approve	M60	Q20
8.2	Determining Compliance and Non-Compliance for Covered Buildings	Milestone	8.2.1	50% of noncompliant buildings complete enforcement proceedings	DOE to review efficacy of the process and discuss improvements for future iterations	M60	Q20





8.2	Technical Assistance in J40 census tracks	CBP Deliverable	8.2.2	Provide technical assistance and legal counsel for compliance for underserved communities and buildings that receive public assistance	DOE to review TA approach	M60	Q20
8.2	Determining Compliance and Non-Compliance for Covered Buildings	Deliverable	8.2	Presentation to DOE on the enforcement process outlining progress, outcomes, and lessons learned to improve on subsequent enforcement proceedings	DOE to review and provide feedback and/or approve	M60	Q20
<b>Task 9.0: Ongoing Implementation and Periodic BPS Modernization</b>							
9.1	Process for Incorporating Programmatic Changes	Milestone	9.1.1	Process for proposing changes to rules and regulations, adjusting incentives, alternate compliance pathways and other components.	DOE to review and provide feedback and/or approve	M72	Q24
9.1	Process for Incorporating Programmatic Changes	Milestone	9.1.2	Process for updating performance pathway targets and use of field studies to validate implementation	DOE to review and provide feedback and/or approve	M72	Q24
9.1	Process for Incorporating Programmatic Changes	Deliverable	9.1	Finalized processes presented to DOE to demonstrate long term viability of savings to be delivered by the BPS.	DOE to review and provide feedback and/or approve	M72	Q24
<b>Task 10: Ongoing Workforce Training and Stakeholder Engagement</b>							
10.1	Ongoing Workforce Training and Stakeholder Engagement	CBP Milestone	10.1	Demonstration of ongoing job creation, stakeholder and community engagement and events as well as ongoing collection of feedback for programmatic improvement	DOE to review and provide feedback and/or approve, and validate.	M72	Q24
10.1	Justice40 Reporting	CBP Deliverable	10.1	Report on how 40% of funding flowed to Justice40 communities (Census tracks). Metrics include decrease in	Submitted to DOE	M72	Q24



				energy burden, increase in housing quality and durability, increased energy resilience and more specified in the FOA.			
BP4	BPS Compliance and Enforcement	Project Close Out	BP4	Milwaukee demonstrates the successful implementation and enforcement of a BPS satisfying the statutory requirements for energy savings, along with measurable growth of the workforce and at least 40% of benefits being realized in disadvantaged communities.	DOE supports analysis and validates savings estimates	M72	Q24

**Appendix: Project Risks Table**

Project Risks	Description	Risk Mitigation Strategy	Status	Impact	Probability	Risk Type
Delay in launch of the Commercial Buildings Help Desk and Resource Center	If it takes significant time to select and coordinate between the consultant and the City of Milwaukee IT dept. to launch the Help Desk, we may need to postpone the first benchmarking reporting deadline, which could delay the entire BPS development process	Prioritize issuing the Request for Proposal, and write it in coordination with the City of Milwaukee IT department mitigate the risk of delay once the consultant is selected and on-boarded.			Medium	Procurement/Contractual/Technical



Delay in commencing Comprehensive Stakeholder and Community Engagement for BPS development	Similarly, if the City of Milwaukee ECO experiences a delay in the stakeholder engagement process, this would slow or postpone development and adoption of the BPS ordinance/law.	Issue the Request for Proposal for an engagement consultant by Q2 or early Q3 of BP 1. Have BPS and Community Outreach Coordinators hired with ECO to assist with the public campaign and organizing meetings.			Low	Procurement/Contractual/Logistical
City of Milwaukee City Attorney determines a BPS ordinance is not legal or enforceable	Upon legal analysis, the City of Milwaukee City Attorney's Office finds that the City of Milwaukee cannot enforce such a BPS ordinance, due to preemption by state law or other issues.	Engage early with the City of Milwaukee City Attorney's Office and provide available analyses on the legality and enforceability of BPS in other states where municipalities are limited by their legislatures to adopt their own building or energy codes.			Low to Medium	Legal
Significant stakeholder and community pushback to a BPS ordinance	Upon commencement of the stakeholder and community engagement to develop Building Performance Standards for the City of Milwaukee, we experience significant concern and community pushback on the concept.	Begin stakeholder and community engagement as early as is feasible, and emphasize the multiple benefits of a BPS in Milwaukee, including the improvements to properties, health benefits, lower utility bills for tenants, etc. Find early champions that can speak to how they met BPS targets. With support of Suburban Energy Coordinator, other communities surrounding Milwaukee begin adopting benchmarking and related ordinances, so that the			Low to Medium	Community



		City of Milwaukee does not appear to be an outlier in the region.				
Inadequate local workforce to effectively operationalize a BPS ordinance	While the first set of BPS targets may be easily achievable for most covered buildings, buildings may be challenged to meet increasingly stringent targets, and there are inadequate energy assessors, building decarbonization, etc. to help building owners meet those targets	Assess the local workforce and begin engaging as early as possible with workforce development agencies, unions, and employers to ensure an adequate workforce to support building owners' compliance the BPS targets. The Green Jobs Coordinator will make this a priority.			Medium	Community/Technical

**Appendix: Key Personnel Table (From Technical Volume)**

The table below summarizes the key personnel on this project:

Team Member	Organization	Role	% of time on project
Sustainability Program Manager	ECO	Policy lead; Procure consultants; Support hiring of new staff	50%
Business Finance Officer	ECO	Provide required financial reports; facilitate grant payments; support budget amendments (if needed)	20%
BPS Coordinator	ECO	Once on-board, lead development of many deliverables; Coordinate with Help Desk Consultant; Coordinate with Community Outreach Consultant on community meetings	100%



Green Jobs Coordinator	ECO	Lead on workforce tasks of this project; Build-out Green Jobs Accelerator	40%
Community Outreach Coordinator	ECO	Support development of community engagement strategies; Help identify stakeholders for engagement committees and boards; Handle logistics for meetings.	60%
Metrics and Milestones Manager	ECO	Once on-board, provide guidance to BPS Coordinator on various overlapping milestones and deliverables for this project.	50%
Suburban Energy Coordinator	ECO	Provide policy development support and presentations to suburban communities surrounding Milwaukee, to encourage them to develop benchmarking and perhaps other GHG-reducing building policies like a BPS.	50%