

Re: City of Milwaukee Proposed Benchmarking Ordinance

6.23.2024

To: Mrs. Pamela Ritger de La Rosa,

Milwaukee Public School's Department of Facilities and Maintenance Services is providing public comment as it pertains to the proposed benchmarking ordinance on behalf of the Milwaukee Board of School Directors. We support the proposed benchmarking ordinance and are expressing concern over the district's ability to provide the data in a timely manner that does not cost significant time or financial resources.

Under Section 2. Energy Benchmarking, § b-1 Milwaukee Public Schools designated as a Class 1 building, will be required to comply with the proposed benchmarking ordinance by June 30, 2025. Whereas owners of Class 3 covered buildings will be required to comply by June 30, 2026. Given that the number of covered buildings owned and operated by the Milwaukee Board of School Directors that would fall under compliance exceeds 140, we propose that our entity and other Class 1 and 2 entities, who own and operate more than 50 covered buildings, are provided an annual extended submission date of three months.

This extension will provide adequate time for Class 1 and Class 2 entities who own and operate over 50 covered buildings to receive, verify, and upload utility data into Energy Star Portfolio Manager from the previous calendar year. Without the cooperation of WE Energies to adopt the ESPM Web Services, Milwaukee Public Schools believes that retrieving and uploading data for over 140 buildings will exceed 2 hours per year of internal time or result in significant financial resources to outsource the task to a third-party.

Under Section 2 Benchmarking Ordinance § i through j-3, regarding enforcement and fines, Milwaukee Public Schools would like to understand (1) how fees will be collected for non-profit or government entities for non-compliance; (2) how will fees collected for non-compliance be used?

In summary, the MPS Department of Facilities and Maintenance Services, on behalf of the Milwaukee Board of School Directors, supports the proposed benchmarking ordinance and is expressing concern over the district's ability to provide the data in a timely manner that does not cost significant resources to the district.

Sincerely,