

FREQUENTLY ASKED QUESTIONS



General

- What is benchmarking and how do I do it?
- What data do I need to benchmark?
- Who is responsible for benchmarking?
- What is a unique building identifier (UBID)?
- Am I required to sign up for and / or submit a form on the BEPS Portal?
- How do I submit a form on the BEPS Portal?
- What is the process for third-party verification?
- Will emissions from the electric grid impact my BEPS compliance?
- What energy uses can be excluded from my benchmarking report?

Compliance Support

- Are there programs or incentives to assist with building upgrades to improve performance?
- Will Maryland have a list of approved or preferred vendors for benchmarking support, third-party verification, and/or retrofits?
- My building has multiple owners. Who is responsible for meeting requirements?
- My building has multiple tenants. How do I go about acquiring their energy use data for benchmarking purposes?
- What happens if I have issues accessing the energy use data for my

building?

- I received a tenant data release consent form from an owner of a property I lease. What is this form and why is it required?

Alternative and Non-Compliance

- What is an alternative compliance payment (ACP) and how does it work?
- My building is not listed on the covered buildings list. Do I need to comply with BEPS?
- If a building's original property type is exempt, such as a K-12 school, but the building is no longer used this way does the building have to comply?
- Is there a penalty for not meeting the benchmarking requirements?
- Are there any accommodations for financial hardship?

General

What is benchmarking and how do I do it?

Benchmarking is the process of compiling your building's energy use and comparing its energy performance to that of similar buildings or an established performance target (i.e. Building Energy Performance Standards).

Owners of buildings that the performance standards apply to, also known as "covered buildings", need to submit annual benchmarking reports to the Maryland Department of the Environment (MDE). A covered building owner can also designate a third-party to submit benchmarking reports. All reports need to be submitted through ENERGY STAR Portfolio Manager, a free online tool. The energy

performance will be evaluated against a performance target that's set based on the type of property (i.e. office space, warehouse, grocery store, etc.).

To learn how to start benchmarking in ENERGY STAR Portfolio Manager, take these [free online training sessions](#). If you are ready to submit a benchmarking report to MDE, learn how to do so in [MDE's Benchmarking Guide](#).

What data do I need to benchmark?

The following data is required for all covered buildings.

- Unique Building Identifier (UBID), as provided by the Department to all covered buildings on the covered building list or at the request of a building owner through a “UBID request form,”
- Property Name;
- Property Address including ZIP code;
- Property Use Type(s);
- Total Gross Floor Area of Property;
 - If the building has multiple uses, for example a financial building with retail stores, offices, and restaurants, follow the instructions within the [EPA Quick Start Guide](#) to report the square footage for each of these uses.
 - If one or more of the building uses are for a food service facility, refer to the benchmarking guide for more information on exclusions.
- Year Built;
- Occupancy;
- Number of Buildings;
- 12 months of energy data from January 1 - December 31 of the year being benchmarked;
 - Energy data includes electricity, natural gas, delivered fuels such as fuel oil or propane, onsite- solar generation, steam, any other energy source including energy for backup generation.

Additional data may be required for specific property types, for exclusions or other special cases. Details may be found in [MDE's Benchmarking Guide](#).

Who is responsible for benchmarking?

Building owners are responsible for the complete and timely submission of data by June 1st each year. Building owners may designate a representative such as an employee or third party who can submit a benchmarking report to MDE via ENERGY STAR Portfolio Manager. **Please note, for 2025 only, benchmarking reports submitted to MDE by September 1, 2025, will be considered timely.**

What is a unique building identifier (UBID)?

A unique building identifier, or UBID, is the reference number assigned to a building that is covered by MDE's statewide BEPS. The UBID is generated by MDE based on the building's location and footprint. You can view your building's assigned UBID on the [BEPS Portal](#). This UBID must be entered into the building's ENERGY STAR Portfolio Manager building profile. For guidance on entering the UBID into ENERGY STAR Portfolio Manager, view section A2, "Add a Property to Portfolio Manager", in [MDE's benchmarking guide](#).

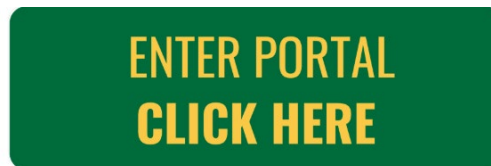
Am I required to sign up for and / or submit a form on the BEPS Portal?

The MDE [BEPS Portal](#) includes open access to the BEPS covered building list and assigned UBIDS. Most building owners will not need to create an account nor submit a form through the MDE BEPS Portal. Most building owners simply submit their benchmarking report to MD-BEPS through ENERGY STAR Portfolio Manager.

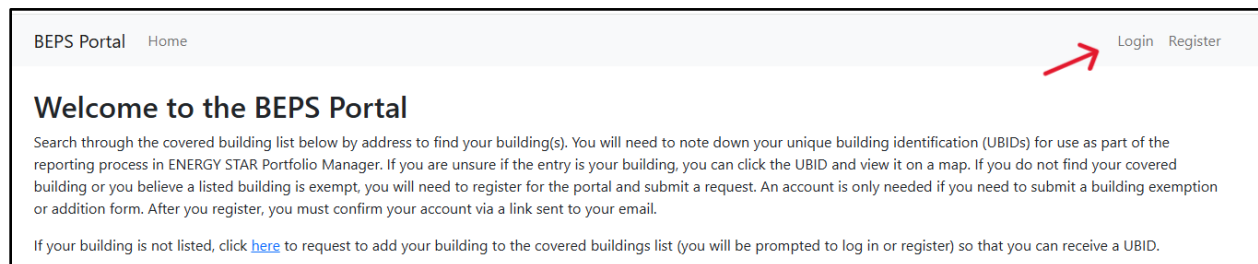
If you do not find your covered building on the list or you believe a listed building is exempt, you will need to register for the portal and submit a request. An account is only needed if you need to submit a building exemption or additional form. After you register, you must confirm your account via a link sent to your email.

How do I submit a form on the BEPS Portal?


1. Go to this [BEPS webpage](#) and read about determining your building's coverage under the regulation.
2. Next, click on the big green button at the bottom of the webpage that says, "ENTER PORTAL CLICK HERE," like below.



3. Once you've entered the BEPS Portal, you'll need to create an account or login into an existing account before you are able to submit any type of form. In the top right-hand corner of the screen, click "login" or "register." See the image below.



4. Once you've logged into your account, search for the covered buildings list on the lower half of the screen to find the building for which you'd like to submit a form. Search for your building by typing in the city, zip code, and/or street address. It is usually best to leave off the final descriptor (e.g. drive, way, road, street) in case it is abbreviated.
5. If you were able to find the correct building on the covered buildings list, click on the **blue clipboard icon** on the left side of your building entry. Then proceed to step 6. See the image below. If you are unable to find your building on the covered buildings list, proceed to step 5A.

Action	UBID	Building Name	Street Address	City	County	Zip Code	Building Status	Building Status Date	Primary
To filter the list of buildings, type in the desired column, then press "Enter"									
			1800 washington						
	87F579G4+G36-56-64-46-57		1800 WASHINGTON BLVD	MORRELL PARK	Baltimore City	21230			Office


- A. If you were unable to find your building on the covered buildings list and you either believe your building is covered or believe it is eligible for an exemption, you'll need to submit a "request for UBID form." Submitting this form will tell MDE to add your building to the covered buildings list and generate a unique building identifier, or UBID. Once that is completed, you'll be able to submit forms. Everyone has access to this request for UBID form at the top of the BEPS Portal. See the image below for the location of the "request for UBID form".


If your building is not listed, click [here](#) to request to add your building to the covered buildings list (you will be prompted to log in or register) so that you can receive a UBID.

Action	UBID	Building Name	Street Address	City	County	Zip Code	Building Status	Building Status Date	Primary

6. Once you've found your building and clicked on the blue clipboard, you'll be able to select any form for your building. Click on the blue clipboard next to the form that's right for you and complete as instructed.

BEPS Portal




Add new form

Building and Forms

7. Once you've submitted a form, MDE's compliance program will review and make a determination. You will receive an email from the compliance program when your form's status has changed.

What is the process for third-party verification?

Every 5 years, starting in 2026, building owners will need to have a third party verify the quality of their benchmarking report(s) before they submit the reports to MDE. The requirements for a third-party verifier and the timeline for verification can be found in the [benchmarking guide](#). Building owners that are using a third party to submit their benchmarking reports to MDE annually may use the same third party for the verification requirement as long as they meet the standards in the [benchmarking guide](#). Internal staff that are benchmarking for a building owner **cannot** be a third-party verifier.

Will emissions from the electric grid impact my BEPS compliance?

No. Emissions from the electric grid are not counted toward the direct emissions performance metric in BEPS. The regulation is only concerned with emissions that are created from sources from a building's site, also known as direct emissions. The only rare exception is if the building is connected to a district energy system, which is not common.

What energy uses can be excluded from my benchmarking report?

There are quite a few energy uses that can be excluded from your benchmarking report. For a full list, see page 20 of the [MDE Benchmarking Guide](#).

The five most common energy uses that can be excluded are those associated with the following:

- Food service facilities
- Required combustion equipment
- Electric vehicle chargers
- Parking lots and garages
- Outdoor heated pools

Each exclusion has its own detailed guidance in the [benchmarking guide](#), but in short, do the following depending on your situation below:

- **Separately metered** - *meaning the energy use is entirely captured on its own meter and is not lumped together with other energy use in the building.*
 - Totally omit this meter and characteristics for the excluded space from your benchmarking report. It is essentially as if this part of the building is nonexistent.
- **Submetered** - *meaning the energy use for the specific use is known, but it is lumped together in normal reporting with some or all of the energy use within the building.*
 - Since it is lumped together with other energy uses, you'll subtract this excluded energy use from the building's benchmarking report by creating a negative meter in Portfolio Manager.
- **Not metered** - *meaning the energy use for the exclusion is not known and is lumped together with other energy uses in the building.*
 - The energy use of this specific exclusion will need to be estimated based on a standard formula. Many of these are built into ENERGY STAR Portfolio Manager itself and the Department will do the work. To find the estimation that's relevant to your exclusion and how to use it, see the [MDE Benchmarking Guide](#).

Compliance Support

Are there programs or incentives to assist with building upgrades to improve performance?

The [Clean Buildings Hub](#), an initiative of the Maryland Energy Administration, exists to empower building owners, operators, and managers to reduce energy and onsite emissions. The Hub achieves this by connecting building owners and operators with available incentives, resources, and technical assistance. The Hub is [compiling](#) available state, federal, local, and utility incentives today, and will continue to grow its library of resources. Submit inquiries to building.decarbonization@maryland.gov and [sign up](#) for the Hub newsletter to be alerted of new funding and financing opportunities, case studies, resources, events, and more.

Will Maryland have a list of approved or preferred vendors for benchmarking support, third-party verification, and/or retrofits?

As part of its [Clean Buildings Hub](#) initiative, the Maryland Energy Administration is building out a process for collecting information from local vendors that can deliver benchmarking support.

My building has multiple owners. Who is responsible for meeting requirements?

If your building has multiple owners, then it is the responsibility of all owners to determine the most effective way to meet the BEPS requirements. MDE will not delegate responsibilities to specific owners. Noncompliance with the regulation's requirements will be seen as noncompliance for all owners of the covered building.

My building has multiple tenants. How do I go about acquiring their energy use data for benchmarking purposes?

Submit a data request to your utility provider(s). For guidance on doing so, see section A.3. "Add Meters and Enter Utility Data" in [MDE'S Benchmarking Guide](#). Note that if your building has less than 5 tenants, you'll need to get authorization from each tenant through a data release consent form or a lease provision.

What happens if I have issues accessing the energy use data for my building?

If you are unable to access the data needed to submit your required reports, please give our team a call at 410-537-3183 or email BEPS.MDE@maryland.gov. Be sure to keep records of your efforts to obtain the data through the methods and timeframes stated in the regulation.

I received a tenant data release consent form from an owner of a property I lease. What is this form and why is it required?

If a BEPS covered building has less than 5 tenants (including you), then the building owner must first receive your authorization for the utility company to provide monthly whole building energy consumption data for BEPS reporting. This authorization may be provided via an authorization for data release form or through a lease agreement provision.

If you need additional clarification about a building tenant's role in Maryland's BEPS, please give our team a call at 410-537-3183 or email BEPS.MDE@maryland.gov.

Alternative and Non-Compliance

What is an alternative compliance payment (ACP) and how does it work?

The alternative compliance payment (ACP) is a compliance pathway for building owners to meet the interim and final net direct emissions standards, starting in 2030. Building owners can achieve compliance with BEPS by paying an ACP for every metric ton of carbon dioxide equivalent in excess of that year's emissions standards for the building's property type. The pricing structure for ACP per metric ton can be found on page 8 of the [regulation](#), section 26.28. 04 "Alternative Compliance and Special Provisions."

My building is not listed on the covered buildings list. Do I need to comply with BEPS?

Any building meeting the definition of a covered building (see below) must comply with BEPS. MDE is working hard to notify all known covered building owners and list them on the covered buildings list. Regardless of whether or not a building is listed, covered building owners must meet the regulation's requirements. An excerpt from the covered building definition is below.

“Covered building” means a building that is a commercial or multifamily residential building in the State of Maryland or is owned by the State of Maryland and has a gross floor area of 35,000 square feet or more, excluding the parking garage area, and is:

(i) A single building;

(ii) One or more buildings held in the condominium form of ownership with a combined gross floor area of 35,000 square feet or more, excluding the parking garage area, and governed by a single board of managers; or

(iii) Two or more buildings with a combined gross floor area of 35,000 square feet or more, excluding the parking garage area, that are served in whole or in part by the same electric or gas meter or are served by the same heating or cooling system or systems, which is not a district energy system.

If a building's original property type is exempt, such as a K-12 school, but the building is no longer used this way does the building have to comply?

ENERGY STAR Portfolio Manager defines property type as "the primary use of a building space." If a building no longer operates as a type that is exempted in the regulation, such as a K-12 school building that has been repurposed into office space, then the building would be covered and required to comply. If your building is not listed on the covered buildings list, you will need to submit a UBID request through the [BEPS Portal](#).

Is there a penalty for not meeting the benchmarking requirements?

Failure to submit a benchmarking report would put the building owner in violation of the requirements of the BEPS regulation. Violations are reviewed and enforced on

a case-by-case basis by the MDE Air and Radiation Administration Compliance Program, and enforcement may range from warnings to fees.

Please reach out to beps.mde@maryland.gov as soon as possible if you have concerns about being able to complete a timely submission.

Are there any accommodations for financial hardship?

A building owner may apply to be exempted from both benchmarking and the performance standard for the following reasons:

- Financial distress;
- The covered building was not occupied during the calendar year being reported; or
- The covered building was demolished during the calendar year for which benchmarking is required.

“Financial distress” means:

(a) A property that is the subject of a tax lien sale or public auction due to property tax arrearages;

(b) A property that is controlled by a court appointed receiver; or

(c) A property that was acquired by a deed in lieu of foreclosure in the last calendar year.

To apply for an exemption, a building owner must submit an exemption request form to MDE via the [BEPS Portal](#) and provide documents to substantiate the request. A building owner may request an exemption at any point prior to the reporting deadline of June 1 of each year. Certain exemptions approved by MDE, like financial distress, will be limited to the benchmarking and performance standard year for which the request was made and will not extend to past or future submissions.