



Shaping Tomorrow's Global  
Built Environment Today

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M. Dennis Knight  
2024-2025 ASHRAE President

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May 13, 2025

The Honorable Kevin Parker  
Chair  
Senate Energy and Telecommunications Committee  
Washington Ave and State St.  
Albany, NY 12224

Re: S. 7429, "Establishing the Energy Performance Benchmarking Program"

Dear Chair Parker and Committee Members:

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 53,000 members, including over 2,000 in New York, focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

We appreciate the opportunity to provide comments to the Senate Energy and Telecommunications Committee on S. 7429, which would establish requirements for energy benchmarking and the creation of energy reduction targets for certain state-owned and state-managed buildings. **We support the legislation's inclusion of ASHRAE Level 2 Energy Audits, and recommend adding a reference in the legislation to the latest edition (currently the 2018 edition) of ASHRAE Standard 211, *Standard for Commercial Building Energy Audits*, which is the relevant standard that addresses Level 2 Audits.**

We also recommend adding references to the following ASHRAE standards in the legislation, which can assist with implementing reductions in the average energy use intensity (EUI) of state-owned and managed buildings, as required in the legislation:

- ANSI/ASHRAE/IES Standard 100-2024, *Energy and Emissions Building Performance Standard for Existing Buildings* provides processes and procedures for reducing energy consumption and carbon emissions through improved energy efficiency and performance of all types of existing buildings, including residential, commercial, institutional, and industrial. It also includes tables to help determine Energy Use Intensity (EUI) targets.

- ANSI/ASHRAE Standard 105-2021, *Standard Methods for Determining, Expressing and Comparing Building Energy Performance and Greenhouse Gas Emissions* provides a comparison of design and operation strategies in new and existing buildings, and assists with the development of building energy and carbon performance standards, as well as the reporting of energy use and greenhouse gas emissions associated with building operations.
- ANSI/ASHRAE Standard 214-2017 (RA 2023), *Standard for Determining and Expressing Building Energy Performance in a Rating Program* provides uniformity in the building energy labeling and disclosure process.

If you have any questions or need additional information, please do not hesitate to contact me or have your staff email [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org). Thank you for your consideration of this important matter and for working to improve the energy efficiency of existing buildings.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is fluid and cursive, with the first name "M." and last name "Knight" clearly legible.

M. Dennis Knight  
2024-2025 ASHRAE President