

# Seattle's Building Emissions Performance Standard (BEPS) Rulemaking

Technical Rulemaking Workgroup –  
Meeting #5



# Agenda

- **Welcome + Introductions of any new attendees** (5 minutes)
  - Consent to record
- **Recap of Meeting #4** (5 minutes)
- **Introduction to End Use Deductions**(15 minutes)
- **End Use Deductions Deep Dive** (30 minutes)
- **Break** (10 minutes)
- **End Use Deductions Deep Dive continued** (30 minutes)
- **Wrap-Up** (10 minutes)



# Welcome + Recap



# Last meeting we discussed...

- Benchmarking Data Verification
  - Key findings from OSE data verification pilots and research
  - Data verification requirements in BEPS
- Qualified Person Requirements
- Key information for data verification
- Requiring site visits for data verification
  - Pros and cons
  - Alternatives
- Verifying ownership of building portfolios



# Charter Agreements

- **Mutual respect** - All working group participants and facilitators are respectful of each other. Members will value each other's time, listen when people are speaking, and speak kindly to each other.
- **Open-mindedness** - Members are open to new ideas and perspectives, and do not disregard ideas they disagree with.
- **Equity** - All members are treated fairly, both by the facilitation team and by one another. Efforts are made to eliminate any real or perceived barriers to participation.
- **Be present** - You reserved the time to be here. Avoid outside distractions as much as possible but take care of your personal needs.
- **Accountability for Accuracy** - When sharing data and information make sure it is accurate and be prepared to provide a credible reference.
- **Chatham House Rule** - Participants are free to use the information received in meetings but should not identify the speaker or their affiliation.



# Introduction to End Use Deductions



# What are end use deductions?

*What the ordinance says...*

(SMC 22.925.120) “Building owners may **deduct the sum of the annual GHG emissions from the following end uses** from their compliance GHGI, for one or more compliance intervals.”



**For discussion today:**

What are the methods for documenting, metering or estimating emissions deductions?

# End use deductions included in BEPS

*Annual GHG emissions from<sup>1</sup>:*

1. Fossil fuel **cooking equipment**
2. Fossil fuel high intensity **process equipment** used in hospitals and laboratories
3. Fossil fuel high intensity **laundry equipment** used in hotels and healthcare
4. Fossil fuel equipment located within an **individually owned residential unit** within a multifamily condominium building
5. Fossil fuel generators used exclusively for **emergency back-up power**
6. Fossil-fuel equipment used for back-up **emergency heat** in hospitals and laboratories
7. **District energy steam**, hot water and/or chilled water provided by a private district energy provider
8. **Electric vehicle charging** equipment
9. Electric loads related to broadcast antennas, on-site cell phone towers or other **communications equipment** that is unrelated to the primary purpose of the building

<sup>1</sup>SMC 22.925.120



# Why are end use deductions included in BEPS?

- Recognize additional variability in building types
- Account for uses that are challenging to replace before the compliance deadline
- Allow time for better or more low emissions market alternatives to be developed and for planning retrofits
- Equity impacts, such as small businesses and condo owners



# GHGI targets were created using reported energy benchmarking data

- SBW Consulting used 2019 energy benchmarking data to develop greenhouse gas intensity targets (GHGITs) by building activity type
  - Data includes emissions from end uses that are eligible for deductions
- Few other BEPS jurisdictions offer deductions as a flexibility measure



# Review from Meeting #1: How are end use deductions factored into compliance GHGI?

ENERGY STAR Portfolio Manager Data	2019 Annual WN Energy Use (kBtu/yr)	2019-2025 Emissions Factors (kg CO2e/kBtu)	Annual GHG Emissions (kg CO2e/yr)
Electric	2,350,000	0.0058	13,630.00
Gas	2,200,000	0.053	116,600.00
Steam	0	0.081	0.00
<b>Subtotal</b>	<b>4,550,000</b>		<b>130,230.00</b>
<b>Less Eligible BEPS End Use Deductions (TBD)</b>	<b>TBD</b>	<b>NA</b>	<b>TBD</b>
<b>Total</b>	<b>4,550,000</b>		<b>130,230.00</b>
<b>Total Gross Floor Area (excluding parking)</b>			<b>75,000 SF</b>
		<b>BEPS Compliance GHGI (kg CO2e/sf/yr)</b>	<b>1.74</b>

# Questions?



# End Use Deductions Deep Dive



# Options under consideration for taking deductions

	Submeter	Standard Calculation	Metered Usage / Other (ESPM = ENERGY STAR Portfolio Manager)
Fossil Fuel Cooking Equipment	✓	✓	
Process Equipment in Hospitals/Labs	✓	✓	
Laundry Equipment	✓	✓	
Individually owned residential condo equipment	✓	✓	
Emergency Backup Power (Generators)			Delivered fuel (don't deduct if not benchmarked in ESPM )
Emergency Backup Heat	✓	✓	
District Energy Steam			Utility metered use from ESPM + attestation
Electric Vehicle Charging Equipment			ESPM calculation or utility metered use (electric)
Communications Equipment			Utility metered use from ESPM (electric)



# Why is a standard calculation estimate helpful?

- Lower cost alternative to submetering
- Equity – consider cost burden to require submetering
- A standard calculation could include translated outreach to help Qualified Persons or owners collect information from tenants (e.g., restaurants, condos)



Seattle Aquarium Café Kitchen

# 1. Fossil fuel **cooking equipment**

## Eligible Deductions

Any covered building (nonresidential or multifamily) may deduct emissions from cooking equipment (e.g., gas stoves, grills) from compliance GHGI

## Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	no	no

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

## Proposed method(s) for documenting, metering, or estimating deduction

- Standardized calculation procedures for various equipment types based on Technical Reference Manuals (TRMs) from the Northwest Regional Technical Forum and Pacific Gas and Electric, in addition to deemed calculations for energy use and GHG emissions
- Submeter



# 1. Fossil fuel **cooking equipment**: *Methodology*

- SBW calculated GHG reductions for various natural gas fueled equipment
- Based on Technical Reference Manuals (TRMs) from the Northwest Regional Technical Forum (NW RTF) and Pacific Gas and Electric
- TRMs are the gold standard for these calculations
  - Individual studies exist but don't represent the entire concept of a piece of equipment
  - Highly vetted throughout energy efficiency industry
  - Regularly updated
  - Reasonable lower cost alternative to an investment grade audit



## Fryers

### AT A GLANCE

CATEGORY	SECTOR
<i>Proven, Small Saver</i>	<i>Commercial</i>
STATUS	APPLICATIONS
<i>Active</i>	<i>Cooking Equipment</i>
FUEL TYPE	SUNSET DATE
<i>Dual Fuel</i>	<i>May 31, 2028</i>



# 1. Fossil fuel **cooking equipment**: *Equipment List*

Equipment	Building Activity Type	Annual Energy Consumption per unit (Therms)	Estimated GHG deduction (kgCO2/yr)	Units
Fryer	Restaurant	1092	5,788	Per fryer
Range	Restaurant	129	683	Per Range
Steamer	Restaurant	701	3,717	Per Steamer
Grill or Griddle (<= 6 SF)	Restaurant	797	4,224	Per grill with less than or equal to 6 SF cook area
Grill or Griddle (>6 SF)	Restaurant	1927	10,213	Per grill with more than 6 SF cook area
Broiler	Restaurant	4706	24,944	Per Broiler
Combination Oven	Restaurant	595	3,154	Per Combination Oven
Oven & Range Combo	Residential - MF	14	73	Per Oven & Range Combination
Standalone Gas Oven	Residential - MF	8	43	Per Oven
Standalone Gas Range/Cooktop	Residential - MF	6	30	Per Cooktop



# 1. Fossil fuel **cooking equipment**: *Example Equipment Source Details*

Process / How to use each sheet		
<p>This workbook provides deemed greenhouse gas intensity (GHGI) reductions for various natural gas fueled equipment. It draws from Technical Reference Manuals (TRMs) from the Northwest regional technical forum and pacific gas and electric. In addition to deemed calculations for energy use and GHGI emissions.</p>		
Deduction Tracker	Methods Summary	Fryer
<ul style="list-style-type: none"> <li>This sheet shows the energy usage and GHGI reductions for various gas-powered equipment. The energy consumption and GHGI reduction values are linked to the Methods Summary sheet which contains more source information and other measure details.</li> </ul>	<ul style="list-style-type: none"> <li>This sheet provides details on how energy usage is calculated.</li> <li>Some values are linked to other sheets that show the specific equipment data</li> <li>GHGI deductions are calculated by converting therms into kilograms of CO2 (kgCO2).</li> </ul>	<ul style="list-style-type: none"> <li>Data sourced from the NW RTF TRM fryer measure</li> <li>The values represent market average data for efficient and current practice dryers of different sizes.</li> </ul>

- Calculation estimates emissions on a per-fryer basis
  - Assumes deep-fat fryer with a pot size 12 inches or larger in width
- GHG deduction (kgCO2/yr)
 

= 5,788
- Multiply total number of fryers by GHG deduction to yield annual deduction

# 1. Fossil fuel **cooking equipment**: *Draft Tool Demo*

## Demonstration

SBW will demonstrate calculator prototype for calculating emissions from fossil fuel cooking equipment

## Discussion

1. Provide feedback on methodology
2. Provide feedback on the included equipment
3. Provide feedback on tool



# 1. Fossil fuel **cooking equipment**: *Draft Tool Demo*

## Fossil Fuel Cooking Equipment GHG Deductions Calculator

Seattle Building ID:	<input type="text"/>	Building Owner/Manager Name:	<input type="text"/>	Qualified Person Name:	<input type="text"/>
Building Name:	<input type="text"/>	Building Owner Email:	<input type="text"/>	Qualified Person Email:	<input type="text"/>
Building Address:	<input type="text"/>	Building Owner Phone Number:	<input type="text"/>	Qualified Person Phone Number:	<input type="text"/>

Equipment Types	Subtype	Quantity
Grill_or_Griddle	<= 6 SF	<input type="text" value="2"/> Grill(s) or Griddle(s)
Grill_or_Griddle	>6 SF	<input type="text" value="2"/> Grill(s) or Griddle(s)
Fryer	Any	<input type="text" value="2"/> Fryer(s)
Range	Any	<input type="text" value="2"/> Range(s)
Broiler	Any	<input type="text" value="2"/> Broiler(s)
Combination_Oven	Any	<input type="text" value="2"/> Combination Oven(s)
Steamer	Any	<input type="text" value="2"/> Steamer(s)

**Total GHG After Deductions:** **94,555** kgCO<sub>2</sub>/yr

Total GHG Before Deductions:	<input type="text" value="200,000"/> kgCO <sub>2</sub> /yr
Total GHG Deductions:	<input type="text" value="105,445"/> kgCO <sub>2</sub> /yr

### DEDUCTIONS BY EQUIPMENT TYPE

Equipment Type	Percentage
Grill_or_Griddle	20%
Fryer	11%
Range	47%
Broiler	1%
Combination_Oven	6%
Steamer	8%



# Mentimeter Feedback & Discussion



A wide-angle photograph of the Seattle skyline, featuring numerous skyscrapers of varying heights and architectural styles. The buildings are primarily glass and steel, reflecting the clear blue sky. In the foreground, the Seattle Aquarium is visible, a dark green building with a curved roof and the number 59 in a circle. The aquarium is situated on a pier extending into the water. The word "BREAK" is overlaid in large, white, sans-serif capital letters in the center of the image.

# BREAK

# Deductions with proposed standard calculation methods



## 2. Fossil fuel high intensity **process equipment** used in hospitals and laboratories

### Eligible Deductions

Any covered hospital or laboratory may deduct emissions from this equipment from compliance GHGI.

### Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	no	no

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

### Proposed method(s) for documenting, metering, or estimating deduction

- Discussion held with hospitals/labs technical experts on 11/13/24
- SBW researching standardized calculation procedures
- Buildings can choose to submeter instead



### 3. Fossil fuel high intensity laundry equipment used in hotels and healthcare

#### Eligible Deductions

Any covered hotel or healthcare-related building activity type\* may deduct emissions from this equipment from compliance GHGI.

\*Includes hospital, nursing home, rehabilitation center, etc.

#### Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	no	no

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

#### Proposed method(s) for documenting, metering, or estimating deduction

- Gas is the primary heating source to dry clothes and linens. Eligible models include any commercial gas dryer in a hotel or healthcare facility. Multiply total number of dryers by GHG deduction to yield annual deduction.
- Dedicated boilers for laundry provide hot water to washing machines in a hotel or healthcare facility. Multiply total dedicated boiler capacity in tons (1 Ton capacity = 12000 BTU/hour) by GHG deduction to yield the total annual deduction.
- Submeter

### 3. Fossil fuel high intensity laundry equipment used in hotels and healthcare – *Tool Preview*

#### Fossil Fuel High-Intensity Laundry Equipment GHGI Deductions Calculator

Seattle Building ID:	<input type="text"/>	Building Owner/Manager Name:	<input type="text"/>	Qualified Person Name:	<input type="text"/>
Building Name:	<input type="text"/>	Building Owner Email:	<input type="text"/>	Qualified Person Email:	<input type="text"/>
Building Address:	<input type="text"/>	Building Owner Phone Number:	<input type="text"/>	Qualified Person Phone Number:	<input type="text"/>

End Use	Equipment Types	Subtype	Quantity
Washing	Washer	Healthcare	<input type="text" value="45"/> Ton(s) Heating Capacity
Drying	Dryer	Healthcare	<input type="text" value="2"/> Dryer(s)
Please_Select	<input type="text"/>	<input type="text"/>	<input type="text"/>
Please_Select	<input type="text"/>	<input type="text"/>	<input type="text"/>

Total GHGI Before Deductions:  kgCO<sub>2</sub>/yr

Total GHGI Deductions: 103,925 kgCO<sub>2</sub>/yr

##### DEDUCTIONS BY EQUIPMENT TYPE

Equipment Type	Percentage
Washer	0%
Dryer	83%
Unlabeled	17%

**Total GHGI After Deductions:**

**-3,925** kgCO<sub>2</sub>/yr



### 3. Fossil fuel high intensity laundry equipment used in hotels and healthcare – *Equipment List*

Equipment	Building Activity Type	Annual Energy Consumption per unit (Therms)	Estimated GHG deduction (kgCO2/yr)	Units
Dryer	Healthcare	8,100	43,200	Per Dryer
Dryer	Hotel	4,500	23,700	Per Dryer
Washer	Healthcare	74	391	Per ton of boiler / heater heating capacity dedicated to laundry
Washer	Hotel	80	427	Per ton of boiler / heater heating capacity dedicated to laundry

# Questions & Discussion



# 4. Fossil fuel equipment in **individually owned residential units** in a multifamily condominium building

## Eligible Deductions

A covered multifamily building that is a residential condo or co-op that has individually owned units may deduct emissions from equipment that is located in the condo owner's unit (e.g., in-unit gas water heaters, gas stoves, gas fireplaces) from compliance GHGI.

## Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	yes	yes

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

## Proposed method(s) for documenting, metering, or estimating deduction

- Standardized calculation procedures for various equipment types (including gas oven/range combo, gas water heater, gas fireplace, and gas furnace)
- Submeter

## 4. Fossil fuel equipment in **individually owned residential units: Tool Preview**

**Residential Fossil Fuel Equipment GHGI Deductions Calculator**

Seattle Building ID:   
Building Name:   
Building Address:

Building Owner/Manager Name:   
Building Owner Email:   
Building Owner Phone Number:

Qualified Person Name:   
Qualified Person Email:   
Qualified Person Phone Number:

End Use	Equipment Types	Subtype	Quantity
Heating	Furnace	Any	<input type="text" value="1"/> Furnace(s)
Cooking	Oven_and_Range_Combo	Any	<input type="text" value="1"/> Oven and Range Combo(s)
Drying	Dryer	In Unit	<input type="text" value="1"/> Dryer(s)
Water_Heating	Water_Heater	Any	<input type="text" value="1"/> Water Heater(s)
Please_Select			<input type="text"/>
Please_Select			<input type="text"/>
Please_Select			<input type="text"/>
Please_Select			<input type="text"/>
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Total GHGI Before Deductions:  kgCO2/yr  
Total GHGI Deductions:  kgCO2/yr

**Total GHGI After Deductions: 8,383 kgCO2/yr**

**DEDUCTIONS BY EQUIPMENT TYPE**

Equipment Type	Percentage
Furnace	40%
Water_Heater	41%
Dryer	10%
Oven_and_Range_Combo	4%

## 4. Fossil fuel equipment in individually owned residential units: *Equipment List*

Equipment	End Use	Building Activity Type	Annual Energy Consumption per unit (Therms)	Estimated GHG deduction (kgCO2/yr)	Units
Water Heater	Water Heat	Any	125	665	Per Water Heater
Oven & Range Combo	Cooking	Any	14	74	Per Oven & Range Combination
Furnace	Heating	Any	136	723	Per Furnace
Fireplace	Heating	Any	128	679	Per Fireplace
Dryer	Dryer	Any	29	155	Per Dryer
Standalone Gas Oven	Cooking	Any	8	43	Per Oven
Standalone Gas Range/Cooktop	Cooking	Any	6	31	Per Cooktop
Patio Heater	Heating	In Unit	33	173	Per in Unit Patio Heater
Outdoor Grill	Cooking	In Unit	4	20	Per in Unit Outdoor Grill
Pizza Oven	Cooking	Any	6	29	Per Oven
Portable Gas Burner	Cooking	Any	138	731	Per Burner



# Questions & Discussion



# Deductions with other proposed calculation methods



# ***Proposed for rule: Clarifying ordinance language***

*What the ordinance says...*

(SMC 22.925.120) “Fossil fuel generators used exclusively for emergency back-up power or fossil fuel equipment used for back-up emergency heat in hospitals and laboratories.”

*Clarifications:*

- **Any covered building** is eligible to take the **back-up emergency generator power deduction**
- **Only hospitals & labs** are eligible to take the fossil fuel **back-up emergency heat deduction**



# 5. Fossil fuel generators used for emergency back-up power

## Eligible Deductions

Any covered building with emergency backup generators may deduct emissions from this equipment from compliance GHGI.

## Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	yes	yes

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

## Proposed method(s) for documenting, metering, or estimating deduction

- Delivered fuels (diesel and fuel oil) are often not reported in energy benchmarking
- If not reported, no need to take deduction
- If benchmarking for ESG reasons, take deduction

# 6. Back-up fossil fuel emergency heat in hospitals and labs

## Eligible Deductions

Any covered hospital or laboratory facility may deduct emissions from this equipment from compliance GHGI.

## Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	yes	yes

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

## Proposed method(s) for documenting, metering, or estimating deduction

- Intent from stakeholders was to account for:
  - Heating capacity during extreme cold or in event of power failure
- Only take deduction when the building has electric system based on system design
- Clarify in rule that this may apply to other healthcare facilities

## 7. Emissions from private district energy provided steam, hot water and/or chilled water

### Eligible Deductions

Any covered building with a contract in place before June 1, 2024 for district thermal energy with a private district energy provider may deduct emissions from steam, hot water and/or chilled water from compliance GHGI.

### Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	no	no	no

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

### Proposed method(s) for documenting, metering, or estimating deduction

- All buildings must demonstrate:
  - Current district energy use
  - Evidence that the contract was established prior to June 1, 2024



## 7. Emissions from **private district energy** provided steam, hot water and/or chilled water

**To take the deduction, all buildings must submit:**

1. Energy meter data for the required BEPS reporting interval from a private district energy meter is tracked in ENERGY STAR Portfolio Manager.
2. Evidence in ENERGY STAR Portfolio Manager of current automated upload from the private district energy provider via a “Data Exchange” property share OR a copy of a bill for the required BEPS reporting interval if the data is being manually entered.

**In addition, one of the following must be provided to confirm the contract was established prior to June 1, 2024:**

1. A copy of a bill dated prior to June 1, 2024, showing service was provided at the building’s address.
2. An affidavit from the private district energy provider stating service was provided at the building’s address prior to June 1, 2024.

# Mentimeter & Discussion



# Deductions that are typically electric loads



# 8. Electric vehicle charging equipment

## Eligible Deductions

Any covered building with EV charging may deduct emissions from this equipment from compliance GHGI

## Allowed Compliance Periods

2027-2030 <sup>1</sup>	2031-2035	2036-2040	2041-2045	2045-2050
yes	yes	yes	yes	yes

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

## Proposed method(s) for documenting, metering, or estimating deduction

- Follow ENERGY STAR Portfolio Manager guidelines for benchmarking EV Charging Stations/EV Chargers



## 8. Electric vehicle charging equipment

### Guidelines from ENERGY STAR Portfolio Manager:

- **If the energy use is on its own meter (not sub-metered),** then leave out the charging station altogether and exclude the meter from your benchmarking.
- **If the energy use is on the main meter, but you submeter it,** then you will exclude it from your building by entering an additional meter with negative entries.
- **If your EV energy is on the main meter and not sub-metered,** then you have to include this energy when benchmarking. Portfolio Manager will deduct from ENERGY STAR Score but this will not impact your electric consumption data.



# 9. Electric loads related to broadcast antennas, on-site cell phone towers or other **communications equipment**

## Eligible Deductions

Any covered building with communications equipment (e.g., antennas, cell towers, etc.) may deduct emissions from this equipment from compliance GHGI. Must be unrelated to the primary purpose of the building.

## Allowed Compliance Periods

<b>2027-2030<sup>1</sup></b>	<b>2031-2035</b>	<b>2036-2040</b>	<b>2041-2045</b>	<b>2045-2050</b>
yes	yes	yes	yes	yes

<sup>1</sup>Option applies to benchmarking verification and/or reporting requirements during 2027-2030.

## Proposed method(s) for documenting, metering, or estimating deduction

- These meters should not be included in benchmarking report
- Data verification should confirm that these are not included

# Mentimeter & Discussion



# Potential to add or extend end use deductions

- The Director by rule may add end uses for highly specialized equipment and add compliance intervals for which the end use deduction applies based on technological and market availability of low and zero GHG emissions alternatives.
- What we've heard:
  - Gas-powered compressors for commercial paint equipment

We welcome feedback: Is there other specialized equipment that must be considered? (Common, high priority, highest emitting?)

# Questions?



# Actions

- End of meeting [check-in](#)
- We will circulate a 'what we heard' summary. Please let us know if anything wasn't captured correctly
- Schedule Updates:
  - In person meeting – planning for Wednesday, December 18<sup>th</sup> at the Smart Buildings Center in Seattle
  - Coffee and welcome at 9:30AM, lunch at 12PM



# Conclusion

- Topics for next session on December 18th:
  - Extensions and Exemptions
- Questions or comments? Email [cleanbuildings@seattle.gov](mailto:cleanbuildings@seattle.gov)

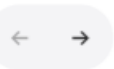
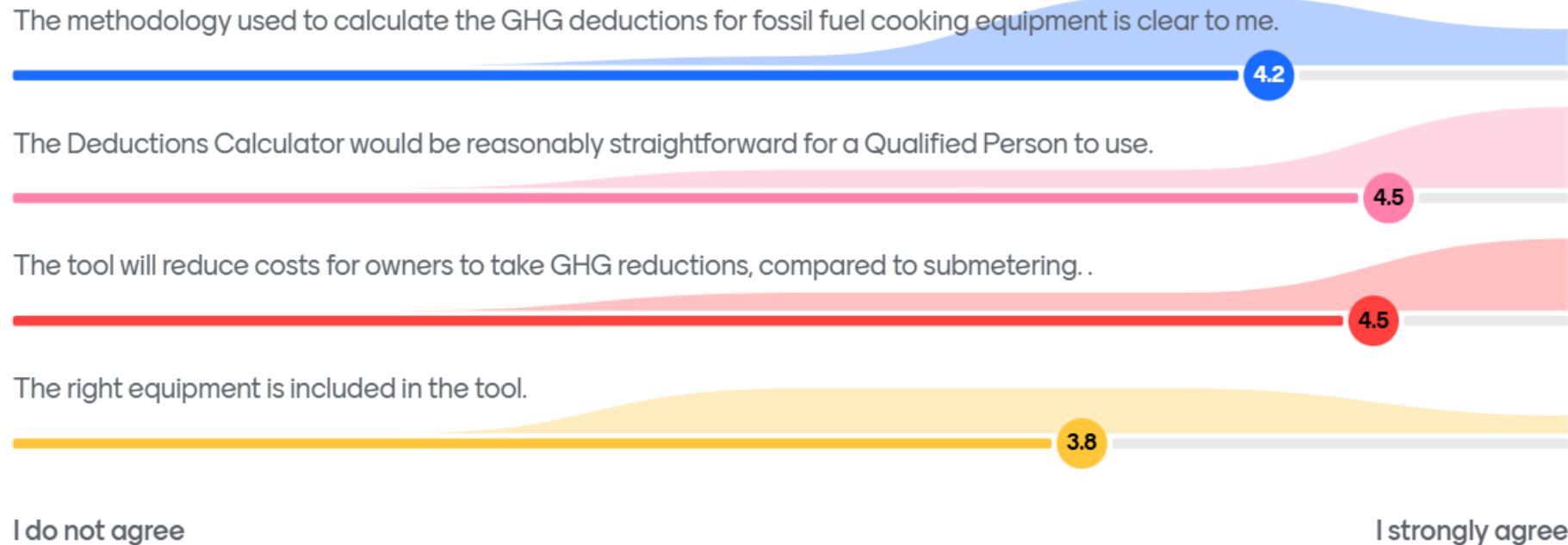
# THANK YOU!



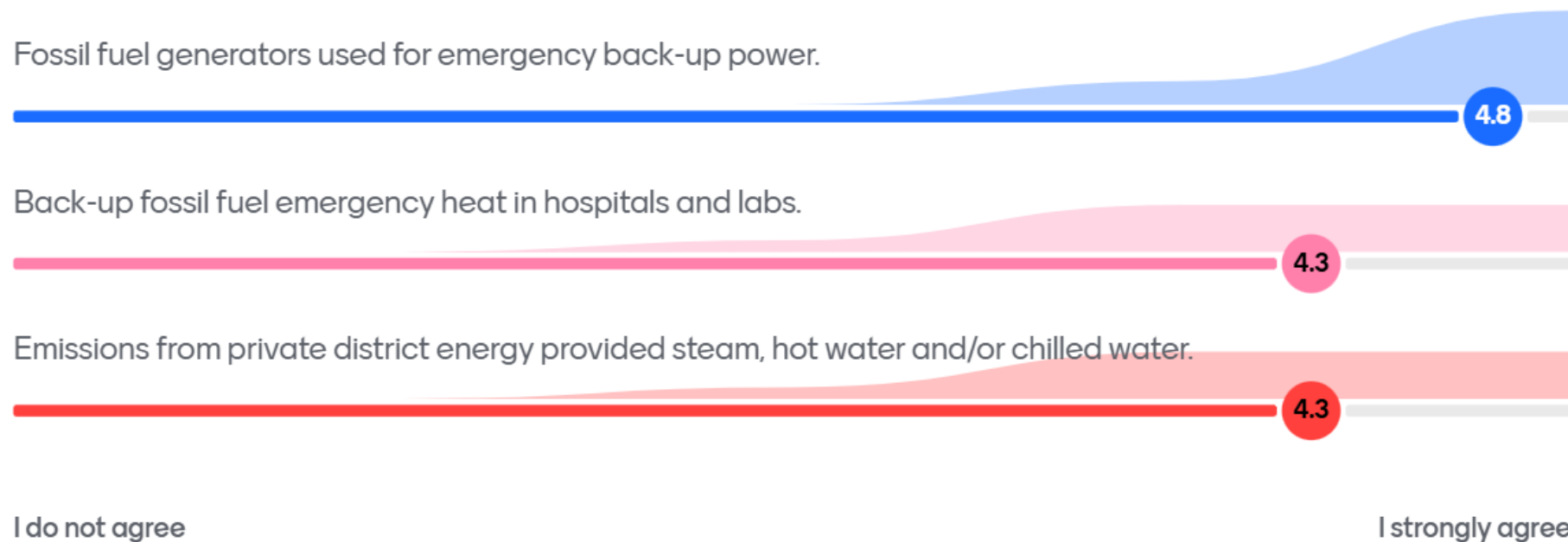
# Summary of Mentimeter Polls



On a scale of 1-5, indicate your support for the following statements:



On a scale of 1-5, indicate your support for the OSE's proposed methods to take deductions for following end use deduction types:



On a scale of 1-5, indicate your support for the OSE's proposed methods to take deductions for following end use deduction types:

Electric vehicle charging equipment.



Electric loads related to broadcast antennas, on-site cell phone towers or other communications equipment.



I do not agree

I strongly agree

