

NRG WEBINAR

Boston's Sustainable Future BERDO Insights for 2025

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BERDO Resources

- BERDO website
- BERDO Basics
- Covered Buildings List
- FAQs about Compliance Mechanisms
- Tenant Authorization Form
- Policies and Procedures Guide
- Emissions Compliance Guide
- Emissions Calculator

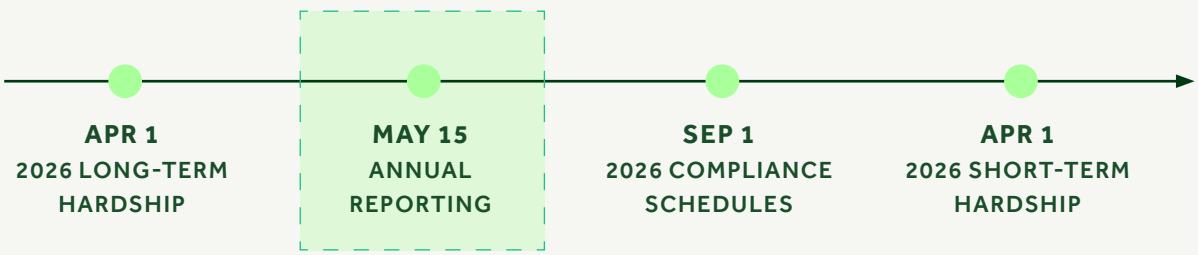
NRG Resources:

- NRG 2023 Sustainability Report

Other Resources:

- Massachusetts Renewable Energy Portfolio Standard
- Cambridge Building Energy Use Disclosure Ordinance

BERDO Deadlines



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BERDO Webinar Questions

Do you have a current percentage of buildings that are already compliant through 2026?

The BERDO emissions targets are designed to become progressively stricter in 5-year increments with the goal of net zero emissions by 2050. For the initial compliance period (2025–2029), many buildings were calculated to meet the requirements without additional action. While we don't have exact numbers, the City of Boston estimates that approximately 80% of eligible building owners will not need to take action during this period. However, this percentage is expected to drop significantly starting in 2030. If you're unsure about your compliance status, NRG can help you determine whether your building exceeds emissions thresholds.

What are the penalties for not complying?

Penalties can range from $300 to $1,000 per day based on building size. There's a penalty for failing to submit a report on time: $300 per day. The penalty for an inaccurate submission range from $1,000 to $5,000.

More information on the requirements for failure to comply with reporting can be found on page 17 in the BERDO Ordinance.

What if my tenants are responsible for procuring energy as part of their lease agreement? Does this impact me as the building owner?

The BERDO regulations apply specifically to building owners. Compliance is based on the overall energy performance and emissions of the entire building, irrespective of tenant energy procurement. Under the Ordinance, building owners may request tenants of their buildings with separate utility meters to provide energy usage information or to authorize the tenant's utility to release this information to the building owner. Owners must aggregate and report building data without disclosing individual energy use details. BERDO has a tenant authorization form available on their website.

To navigate responsibilities, building owners should review lease agreements and seek professional assistance, like legal counsel and energy consultants, for effective compliance navigation.

Do I need to pay to offset all of my energy consumption?

No, under BERDO, you are required to address only the emissions that exceed the permissible limits set for your building. These excess emissions must be calculated and certified by a third party. BERDO provides an online emissions calculator to help building owners determine their projected emissions limits and estimate compliance costs. It's important to note that these limits become stricter over time, with 2030 posing a greater challenge than 2025.

If I have a low emissions limit in the first years and a higher emissions limit in later years, does NRG offer a solution to contract for a smaller volume upfront and a larger volume for later years?

Yes. This is the flexibility that we have built into the Renewable Grid Connect product, and we can work with you to achieve it.

I have multiple buildings under a contract – is there flexibility in how the RECs are retired – meaning do I need to keep to a set retirement volume for the term of the agreement or is there flexibility?

Yes, there is flexibility. You can adjust REC allocations among your compliance buildings and pool your buildings into a portfolio for greater management options.

Aren't PPA projects readily available? So, what is the urgency to transact now?

It is correct that there are many renewable projects under development; however, the capacity from most projects that are coming online in the near-term have already been sold. When projects are contracted under a Power Purchase Agreement (PPA), they are often fully subscribed for financing purposes. Finding a new project – with supply available at a fair price and the proper timing is likely limited. Fortunately, NRG has PPA supply available from projects that came online in 2024 and executed contracts with building owners prior to commencement of operations by the projects. Contracting the supply from our project provides significant savings versus other compliance alternatives such as MA Class I REC or the ACP.

Is it mandatory to calculate the energy outputs based on "production efficiencies" or is it enough to allocate the final GHG emissions using the proportions of the energy outputs?

This is not a simple calculation that our normal procurement team will handle. You will want to work with a third-party verifier, or we have experts at NRG that can help; your account executive can connect you.

BERDO provides guidance on emission factors starting on page 7 of their Policies and Procedures guide. While every building is unique, we recommend engaging a third-party verifier to conduct a comprehensive assessment of the building envelope, operational equipment, and historical usage. This evaluation will help in developing a tailored decarbonization roadmap specific to your building's needs. For assistance in connecting with a third-party verifier, you can reach out to your account executive.

How are the needs of historic buildings addressed under BERDO?

BERDO does not provide a blanket exception or exemption for historic buildings. The City's BERDO team advises historic building owners to review the Hardship Compliance Plan instructions available on the BERDO website. Please note that the deadline to submit a Hardship Compliance Plan application is April 1, 2025.

Is gas consumed by Combined Heat & Power (CHP) Units to produce electricity considered exempt under BERDO? Is energy produced by a CHP unit considered renewable?

Gas consumed by CHP units is not exempt under BERDO, and energy produced by CHP units is not considered renewable.

Are long-term leaseholders exempt from BERDO requirements if they don't own the building?

Compliance obligations under BERDO generally apply to building owners. Long-term leaseholders should consult their lease agreement for provisions related to regulatory compliance. For specific guidance, we recommend reaching out to the BERDO team at the City of Boston.

How does the greening of the grid under BERDO impact the amount of green energy purchased each year. Will there be a sliding scale over the next 20 years as Massachusetts moves to net zero by 2050?

This is a great question, but it falls outside our specific expertise. For details on how the greening of the grid under BERDO might affect green energy purchasing requirements or any potential sliding scales tied to Massachusetts' net zero goals, we recommend reaching out to the City of Boston's BERDO team or the appropriate state agency managing the Commonwealth's net zero roadmap. They would have the most accurate and detailed insights on this topic.

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