

April 7, 2026

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The Honorable Audrey Robertson
Assistant Secretary
Office of Critical Minerals and Energy Innovation
U.S. Department of Energy
1000 Independent Ave., SW
Washington, DC 20585

Re: ENERGY STAR® MOU

Dear Assistant Secretary Robertson:

The Building Owners and Managers Association (BOMA) International supports the new role of the Department of Energy (DOE) as lead federal agency for the ENERGY STAR program, as indicated in the recent [Memorandum of Agreement](#) (MOA) with the Environmental Protection Agency (EPA). We look forward to working closely with you and your staff to ensure an effective transition that maintains and evolves the voluntary ENERGY STAR public-private partnership.

For over 20 years, BOMA has been a staunch supporter of the voluntary ENERGY STAR program. Our members use the Portfolio Manager program to benchmark their energy use, using the data to improve their operations, reduce operational costs, and comply with local regulations. In total, over 330,000 buildings use the Portfolio Manager program, representing nearly 25% of all commercial floor space in the nation. BOMA members across Canada also rely on the program, bringing a level of importance few governmental programs can claim. BOMA sustainability frameworks —most notably BOMA BEST®—rely on ENERGY STAR Portfolio Manager for benchmarking and scoring energy performance. This is why BOMA vigorously advocated for Congress to fully fund the program in 2025.

Many federal, state, and local benchmarking and energy disclosure laws rely on ENERGY STAR Portfolio Manager to compare the energy performance of buildings of similar size and use. These laws require building owners to report energy use on a whole-building basis, normalized by total building size, which ENERGY STAR defines as “gross floor area”—all enclosed space measured to the exterior walls.

The BOMA Floor Measurement Standards are the dominant, ANSI accredited method for measuring commercial building area in the United States, making them the practical market standard even though their use is voluntary.

While most of the BOMA measurement standards (ANSI/BOMA Z65.1) are optimized for leasing with a focus on Rentable Area, BOMA's Floor Measurement Standards Committee reviewed the essential requirements for energy benchmarking and was able to align BOMA's Gross Areas standard (ANSI/BOMA Z65.3) with ENERGY STAR. As a result, the 2024 edition of that standard introduced "Gross Area 5 – ENERGY STAR", which is explicitly designed to match the ENERGY STAR Portfolio Manager GFA definition, allowing building owners to report data that is accurate, transparent, and comparable across jurisdictions. In short, BOMA standards will generate the reliable denominator upon which ENERGY STAR data is calculated.

This alignment helps ensure that benchmarking and disclosure laws are implemented as intended—producing reliable data for policymakers, meaningful comparisons for the public, and defensible compliance pathways for building owners—without conflating energy reporting requirements with leasing or rent-calculation practices. The DOE has a long history of collaborating with the buildings sector to advance best practices in building design, construction, and operations. With this move, BOMA looks forward to working with the Office of Critical Minerals and Energy Innovation, along with support from the National Laboratories, to grow ENERGY STAR to meet current and future needs of its users.

While the MOA initiates the transition of management activities, including partnership agreements, trademark(s), IT systems and databases, it is silent, appropriately so, regarding staff. Nevertheless, BOMA counsels that, during the 90-day period, the agencies establish a process allowing EPA employees with essential program experience to transfer to DOE, should they choose, in order to maintain program continuity.

Finally, it's worth noting that while BOMA supports the program's transition to the Department of Energy, our principal concern is ensuring there is no interruption in service during the transition. Although interdepartmental program transfers are uncommon, we are confident that the experienced management teams overseeing this effort will work diligently to ensure a smooth and seamless process. Should any issues arise, we will promptly communicate them to your office with the confidence that they will be addressed in a timely manner.

Founded in 1907, BOMA is a federation of 80 U.S. local associations whose 18,000+ members are located in every state. As the leading trade association for commercial real estate professionals, BOMA represents owners, managers, service providers, and other property professionals for all commercial building types, including office, industrial, medical, corporate, data centers, and mixed-use. U.S. private-sector office buildings served by BOMA's local associations represent 8.6 billion square feet of office space, support 1.7 million jobs, generate \$75 billion in salaries and income and contributes \$148 billion to the national economy. BOMA advocates for policies that promote responsible investment, economic growth, and vibrant communities.

On behalf of all BOMA members, we look forward to working with you and your staff to achieve the goals of the program. If BOMA can be of service to improve Energy Star, or any other building related matter, please do not hesitate to contact us.

Respectfully,

Luci Smith

Luci Smith
Chair & Chief Elected Officer
BOMA International Executive Committee

Mary Lue Peck

Mary Lue Peck
President & Chief Operating Officer
BOMA International

cc: The Honorable Aaron Szabo, Assistant Administrator, US-EPA