



**BSR/ASHRAE/IES Addendum f
to ANSI/ASHRAE/IES Standard 100-2024**

Public Review Draft

**Proposed Addendum f to
Standard 100-2024, Energy
Efficiency in Existing Buildings**

**First Public Review (August 2026)
(Draft Shows Proposed Changes to Current Standard)**

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(This foreword is not part of this standard. It is merely informative and does not contain requirements necessary for conformance to the standard. It has not been processed according to the ANSI requirements for a standard and may contain material that has not been subject to public review or a consensus process. Unresolved objectors on informative material are not offered the right to appeal at ASHRAE or ANSI.)

FOREWORD

This amendment adds a set of **Alternative Compliance Pathways (ACPs)** to Standard 100, to address circumstances where meeting the EUI and/or GHG target in a short timeframe is cost-prohibitive and/or technically infeasible. At present Standard 100 proposes that if the energy efficiency measures (EEMs) and emission reduction measures (ERMs) identified in the audit are not sufficient to meet the target, the building owner and qualified professional should “try again” (as stated in figure 4-1). This recursive loop is sufficient for a voluntary standard, but for a mandatory standard enforced by an AHJ, other compliance options are needed to increase flexibility and reduce liabilities.

Across almost all existing Building Performance Standard (BPS) policies in the U.S., this flexibility is provided through Alternative Compliance Pathways (ACP). An ACP is a compliance mechanism designed for buildings that cannot meet the standard performance targets on time, while still driving energy reductions and improvements. While ACPs are included in most existing BPS, they vary widely in structure, terminology, eligibility, enforceability, and effectiveness.

For a summary of existing ACPs offered in BPS policies, see: Duer-Balkind, M., M. Koolbeck, and C. Kelley. 2025. *The Landscape of Building Performance Standard Pathway Alternatives: Review of Existing Alternative Compliance Pathways and Resources to Support Standardization*. Washington, DC: Institute for Market Transformation. <https://imt.org/resources/the-landscape-of-building-performance-standard-pathway-alternatives>

An interdisciplinary working group led by the Institute for Market Transformation (IMT) discussed existing ACPs and how to standardize options across jurisdictions. The pathways proposed in this Addendum (as well as Addenda E and H) are the result of this effort. Stakeholders included in the interdisciplinary working group included engineers, policy makers, SSPC 100 members, and representatives from AHJs with existing BPS laws. IMT worked in close collaboration with SPC 100 on this addendum. SSPC 100 Working Group 4 (Compliance) thanks IMT for contributing the valuable results of stakeholder engagement and knowledge distillation.

The following compliance pathways are proposed for buildings with performance targets.

Energy Audit Compliance Pathway: Current mandatory option under Standard 100 for buildings that do not meet the performance targets; it is moved into a subsection and given the name “Energy Audit Compliance Pathway,” but is otherwise unchanged.

Percent Reduction Compliance Pathway: A pathway for a percent reduction over an individual building’s established baseline offers flexibility for buildings that have constraints in meeting the standard target. This pathway is especially useful for buildings with high energy use intensities or unique use cases. It also provides a simple, performance-based compliance option that can be used in a consistent way across jurisdictions.

The percent reduction is defined as a set percent reduction in weather-normalized site energy use intensity over 5 years. A value of 20% is included in the normative text, but an AHJ should select a percent reduction that reflects the local building stock, similar to how AHJs typically set locally-specific targets – ideally striking the balance of being achievable for most buildings that may need added flexibility while still encouraging progress towards jurisdictional energy and climate goals. Common ranges are 15 to 20% over 5 years in existing BPS. These values are generally achievable for buildings with higher energy use intensities, which is the primary suggested use case for this option.

Strategic Decarbonization Plan (SDP) Pathway: Also known as a “Building Performance Action Plan (BPAP),” this pathway provides the longer-term flexibility for buildings and campuses with complex systems and long capital replacement cycles. It is built on guidance established in the *ASHRAE Guide to Strategic Decarbonization Planning*. This pathway is designed to allow buildings to set a plan to make progress toward BPS goals when meeting the targets is infeasible in the short-term and other pathways do not address the circumstances. The pathway requires the filing of a long-term plan for efficiency decarbonization that can be implemented over up to 20 years, during which not only must EUI targets be met, but all onsite and district energy GHG emissions (other than backup power) must be eliminated. The pathway also requires the establishment of a five-year capital plan with short-term EEMs and ERMs, and requires that at least 10% energy and emissions be achieved over the first five years of the plan. Achievement of this initial performance goal is required for conditional compliance.

This pathway can be used to adjust targets, timelines, or both. While that may sound like two different ACPs, a single ACP structure can and should support both as the SDP process is fundamentally the same either way, and because the process of plan development itself may shift expectations of what is needed—so it is important to avoid lock-in and path dependency.

Moreover, due to unusual circumstances, some buildings are a poor fit for default targets. Often these buildings have significant process loads and/or uses not contemplated in the default policy. In these cases, it may be most appropriate for the owner to propose a custom final target and interim targets. This should be reserved for buildings with no other option, and so is handed as an exception. An informative note suggests that an application for a custom target should include detailed engineering and financial analysis that justify eligibility and show that meeting the default target at any date is cost prohibitive.

For verification, the building owner or qualified professional must submit periodic updates on plan implementation as well as current EUI and GHGI performance. If the EUI and/or GHGI is more than 15% off where the interim target said it should be, the plan must either be revised or additional EEMs must be implemented. At the end of the plan period, the building must achieve the standard or custom target EUI and GHGI, or undertake additional EEMs and ERMs as necessary, as with the structure in the audit compliance path.

Note: In this addendum, changes to the current standard are indicated in the text by underlining (for additions) and strikethrough (for deletions) unless the instructions specifically mention some other means of indicating the changes. Only these changes are open for review and comment at this time. Additional material is provided for context only and is not open for comment except as it relates to the proposed substantive changes.

Revise Section 3 (definitions) as follows:

compliance cycle: A period of time within which a building is required to meet the requirements of this standard, as determined by the *AHJ*.

Informative note: A 5-year period is a common length for a *compliance cycle*.

Revise Section 4.4.2 as follows:

4.4.2 Buildings with Performance Targets

4.4.2.1 Compliance Process. *Buildings with performance targets* shall comply with the requirements of Sections 4.4.2.2. Figure 4-1 illustrates the compliance process for *buildings with performance targets*.

Informative note: The *AHJ* may establish a *compliance cycle* for buildings to either meet the Standard, or to undertake and complete a compliance path under section 4.4.2.3 and demonstrate improved *performance*.

4.4.2.2 Building Meets the Performance Targets. If the ~~building's~~ measured *EUI* is less than or equal to ~~the its~~ *EUI target*, and the ~~building's~~ measured *GHGI* is less than or equal to ~~the its~~ *GHGI target*, then the *building* complies.

Informative Note: The *AHJ* has the authority to remove either the *EUI* or *GHGI* requirement above and to specify whether the *EUI target* is based on *site EUI* or *source EUI*.

4.4.2.3 Building Does not Meet the Performance Targets. If either the ~~building's~~ measured *EUI* is greater than the *EUI target* or the ~~building's~~ measured *GHGI* is greater than the *GHGI target*, then the building shall comply with the requirements of Section 4.4.2.3.1.

4.4.2.3.1 Audit Compliance. An energy audit with decarbonization assessment shall be performed. A qualified energy auditor shall complete an energy audit according to Section 8. *EEMs* and *ERMs* that will reduce energy use and *GHG emissions* to meet the *EUI target* and *GHGI target* shall be implemented according to Section 9. Upon completion of the implementation of all required *EEMs* and *ERMs*, a building shall be granted *conditional compliance*.

Exception to 4.4.2.3.1: Where approved by the *AHJ*, the building may comply via one of the alternative compliance pathways outlined in Section, 4.4.2.3.3, 4.4.2.3.4, or Section 4.4.2.3.5.

4.4.2.3.2 (Reserved)

4.4.2.3.3 Percent Reduction Compliance. A *qualified person* shall review the energy use and *GHG emissions* of the *building* and develop a plan to reduce the *EUI* by not less than 20% compared to *baseline EUI* over a period of not more than five (5) years. The gross floor area, primary activity, and any excluded energy loads shall be consistent between the *baseline* and savings verification years when calculating reduction in *EUI*, except where permitted by the *AHJ*.

Informative Note: *Buildings* may only use percent reduction for multiple *compliance cycles* with approval of the *AHJ*.

4.4.2.3.4 Strategic Decarbonization Plan Compliance. A *qualified person* shall review the energy use and *GHG emissions* of the *building* and develop a Strategic Decarbonization Plan (SDP), meeting requirements established by the *AHJ* and submit for approval to the *AHJ*. The SDP shall include planned

EEMs, ERMs, projected EUI, and projected GHGI for a time period not longer than 20 years. Additionally, it shall meet the following requirements:

- a. Planned EEMs and ERMs shall reduce EUI sufficiently to meet the EUI target by the final year of the plan.
- b. Planned EEMs and ERMs shall reduce GHG emissions from on-site combustion and district energy systems to a GHGI target of zero (0) by the final year of the plan, excluding emissions from backup and emergency power generation.
- c. Planned EEMs and ERMs shall reduce EUI by at least 10% relative to the baseline EUI within the first five years of the plan without increasing the GHGI, and
- d. The plan shall identify planned EEMs, ERMs, projected EUI, and projected GHGI for every subsequent five (5) year interval through the final year of the plan.

EEMs and ERMs shall be implemented in accordance to Section 9. Upon approval of the SDP, and implementation of EEMs and ERMs planned for the first five years, the building shall be granted conditional compliance.

Exception to 4.4.2.3.4: Where approved by the AHJ the SDP shall be permitted to use a custom final EUI target or custom final GHGI target.

Informative Notes:

- a. The AHJ can establish requirements for the SDP based on the ASHRAE Guide to Strategic Decarbonization Planning or another recognized resource.
- b. The AHJ may consider establishing additional eligibility criteria for a building to comply using the SDP pathway, such as financial infeasibility, technical infeasibility, affordable housing restrictions, lease restrictions, and district energy system decarbonization.
- c. Prior to approving an SDP that uses a custom final EUI or GHGI target per the Exception to 4.4.2.3.4, an AHJ may require proof that meeting the EUI target and reducing GHGI from onsite combustion to zero within 20 years is cost-prohibitive or technologically infeasible, including engineering analysis and lifecycle cost analysis.

4.4.2.3.5 (Reserved)

4.4.2.4 Verification of Compliance.

4.4.2.4.1 Audit Verification. Within fifteen months after the completion of Section 4.4.2.3.1, the EUI and GHGI shall be recalculated by the *energy manager* from 12 consecutive months of measured energy use, and Form A shall be resubmitted to the AHJ. If the *building's* postimplementation EUI is less than or equal to the EUI target, and the *building's* postimplementation GHGI is less than or equal to the GHGI target, the *building* complies with the standard. If the *building's* postimplementation measured EUI is greater than the EUI target, or the *building's* postimplementation measured GHGI is greater than the GHGI target, the *building* does not comply with the standard and the *conditional compliance* is suspended until either

- a. Additional EEMs and ERMs have been implemented that reduce the subsequently measured EUI and GHGI to less than or equal to the EUI target and GHGI target, respectively, and a new Form A is submitted to the AHJ or
- b. The AHJ revokes *conditional compliance*

4.4.2.4.2 (Reserved)

4.4.2.4.3 Percent Reduction Verification. Within 5 calendar years from the *baseline* for 4.4.2.3.3, the *EUI* shall be recalculated by the energy manager from 12 consecutive months of measured energy use, and Form A shall be resubmitted to the *AHJ*. If the *building's* postimplementation *EUI* is less than or equal to 80% of the baseline *EUI*, the *building* complies with the standard. If the *building's* postimplementation *EUI* is greater than 80% of the baseline *EUI*, the *building* does not comply with the standard until additional measures have been implemented that reduce the subsequently measured *EUI* to less than or equal to 80% of the baseline *EUI* and a new Form A is submitted to the *AHJ*.

4.4.2.4.4 SDP Verification.

4.4.2.4.4.1 SDP 5 Years. Within 5 years from SDP approval, the *EUI* and *GHGI* shall be recalculated by the *energy manager* from 12 consecutive months of measured energy use, and Form A shall be resubmitted to the *AHJ*. If the *building's* postimplementation *EUI* is greater than or equal to 90% of the baseline *EUI*, the *building's conditional compliance* is suspended until either

- a. Additional measures have been implemented that reduce the subsequently measured *EUI* to less than or equal to an amount that is 90% of the baseline *EUI* and a new Form A is submitted to the *AHJ* or
- b. The *AHJ* revokes *conditional compliance*

4.4.2.4.4.2 SDP Interim Compliance. Within fifteen months after the completion of an approved interim SDP milestone, the *EUI* and *GHGI* shall be recalculated by the *energy manager* from 12 consecutive months of measured energy use, and Form A shall be resubmitted to the *AHJ*. If the *building's* postimplementation measured *EUI* or postimplementation measured *GHGI* is more than 15% greater than the projected *EUI* and projected *GHGI* for the interim step, the *building's conditional compliance* is suspended until the energy manager submits a report that includes an explanation of why the savings are lower than expected, and a revised plan for how the *building* will achieve the approved SDP *performance goals*, or the *AHJ* revokes *conditional compliance*

4.4.2.4.4.3 SDP Final Compliance. Within fifteen months after the completion of the approved SDP, the *EUI* and *GHGI* shall be recalculated by the *energy manager* from 12 consecutive months of measured energy use, and Form A shall be resubmitted to the *AHJ*. If the *building's* postimplementation measured *EUI* is less than or equal to the SDP *EUI target*, and the *building's* postimplementation measured *GHGI* is less than or equal to the SDP *GHGI target*, the *building* complies with the standard. If the *building's* postimplementation measured *EUI* is greater than the SDP *EUI target*, or the *building's* postimplementation measured *GHGI* is greater than the SDP *GHGI target*, the *building* does not comply with the standard and the *conditional compliance* is suspended until either

- a. Additional measures have been implemented that reduce the subsequently measured *EUI* to the SDP *EUI target* and the measured *GHGI* to the SDP *GHGI target*, and a new Form A is submitted to the *AHJ* or
- b. The *AHJ* revokes *conditional compliance*

Replace Figure 4-1 as follows:

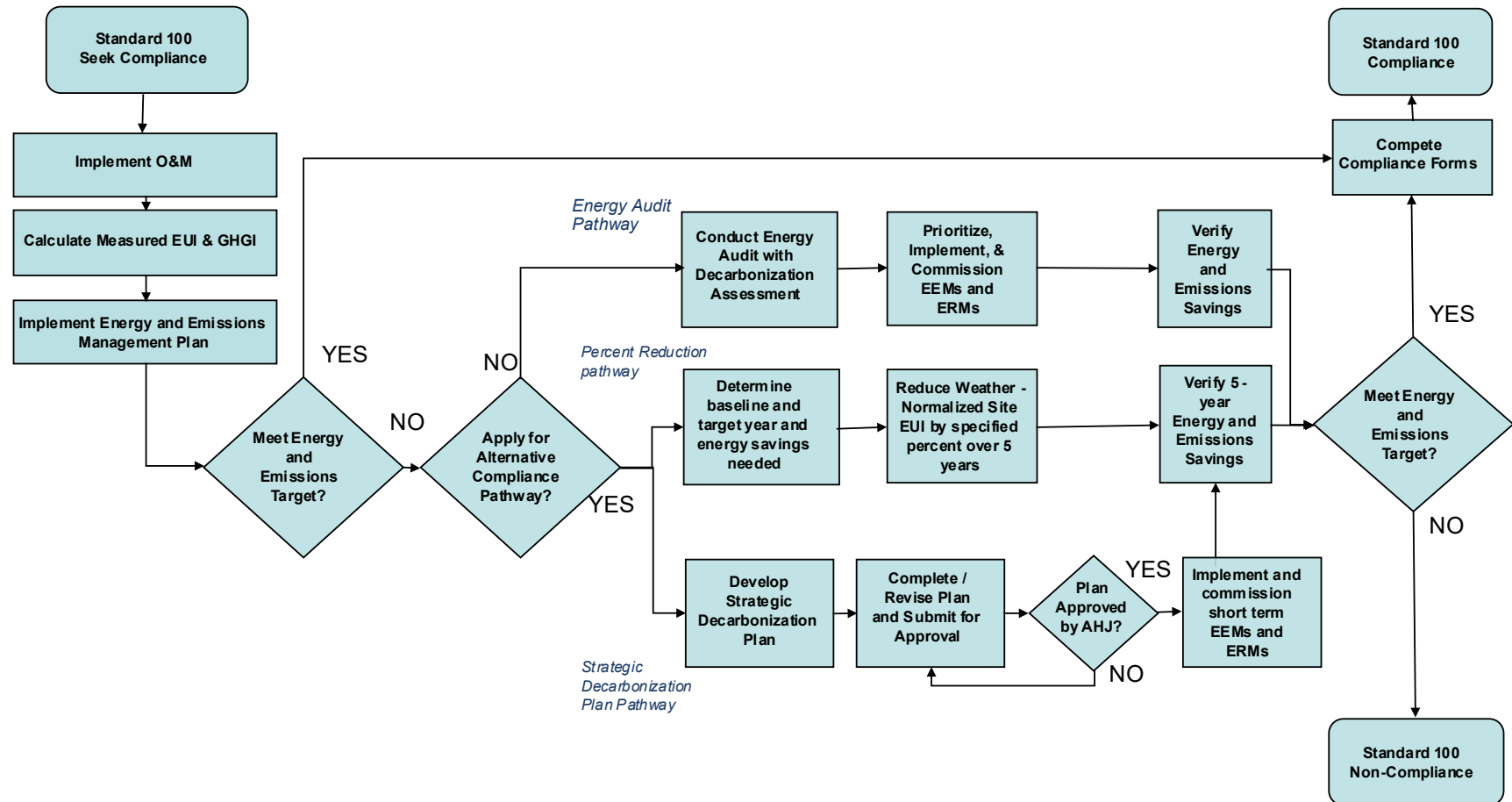


Figure 4-1: Flowchart for compliance path for buildings with performance targets

Figure 4-1 Flowchart for buildings with performance targets.

Revise Section 4.5 as follows:

4.5 General

4.5.1 Administrative Requirements. Administrative requirements relating to permits; eligibility and processing of extensions; enforcement by the *AHJ*; locally adopted energy standards, including energy *performance targets*; interpretations; claims of exemption; and rights of appeal are specified by the *AHJ*.

4.5.2 Alternative Energy Use Intensity Targets. The *qualified person* determining compliance shall demonstrate to the *AHJ* that they have met the required *EUI targets* on either a *site energy* or *source energy* basis in accordance with Section 7 or Section 10 or have met the requirements in Section 4.4.3 for buildings without *EUI targets*. Alternative *performance* requirements, such as those in Normative Appendix B, are permitted to be specified by the *AHJ*.