City of Ann Arbor Energy and Water Benchmarking and Disclosure Ordinance

Annual Report - Calendar Year 2024 Data

Summarizing energy and water consumption statistics, trends observed in consumption over time, changes in the portfolio of Covered Properties over time, and assessing data quality and accessibility.

Revised January 20, 2026

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Report Overview

This report summarizes calendar year 2024 results for properties required to comply (Covered Properties) with the City of Ann Arbor's Energy and Water Benchmarking and Disclosure Ordinance (Benchmarking Ordinance). The report summarizes energy and water consumption statistics, compliance rates, data accuracy, data accessibility, changes across the portfolio over time, and trends observed across Covered Properties who have submitted reports for calendar year 2021 through 2024. Note that the term property can refer to a single building or multiple buildings.

While the report details compliance rates, property demographics, data accuracy, and data accessibility across all Covered Properties, energy and water consumption statistics presented only represent properties compliant with the Benchmarking Ordinance. While some compliant properties may have data accuracy issues, compliant properties have more accurate and complete data than non-compliant properties.

Background

In June of 2020, Ann Arbor City Council unanimously adopted a goal of achieving a just transition to community-wide carbon neutrality by 2030, known as A^{2}ZERO. The A^{2}ZERO Plan covers seven strategies to reduce emissions in Ann Arbor, including those from operating buildings, such as increasing the energy efficiency of buildings, converting fossil gas-burning appliances to electric ("electrification"), and generating electricity with renewable sources. To help understand emissions sources and types, the City conducts an annual greenhouse gas emissions inventory.

As of the City's 2024 Greenhouse Gas Inventory, emissions from buildings accounted for 63.45% of Ann Arbor's total greenhouse gas emissions, making buildings an important target area to advance the City's sustainability and health work. One key policy lever the City has been using to understand and reduce emissions in the building sector is the Commercial and Multi-Family Benchmarking Ordinance (Benchmarking Ordinance).

Passed by the Ann Arbor City Council in October 2021, the Benchmarking Ordinance is one of three ordinances now in effect to increase the transparency of building efficiency.

- The Home Energy Rating and Disclosure (HERD) ordinance. HERD applies to single family detached homes or "side-by-side" townhomes in the City of Ann Arbor, including those within condominiums or homeowners' associations.
- The Green Rental Housing (GRH) Ordinance. GRH applies to all rental units in the City of Ann Arbor.
- The Energy and Water Benchmarking Ordinance applies to commercial and multifamily properties in the City of Ann Arbor over 20,000 sq. ft. of gross floor area (GFA.) Note that most institutional buildings, such as those owned by the University of Michigan and Ann Arbor Public Schools, are exempt from City Ordinances. While they may independently track their energy and water use, they are not required to report under the Benchmarking Ordinance.

Property Size Required to Report Through Ann Arbor's Benchmarking Ordinance	Initial Reporting Deadline
Covered City Properties ≥ 10,000 sq. ft.	Dec 31, 2021
Covered Non-City Properties ≥ 100,000 sq. ft.	Jun 1, 2022
Covered Non-City Properties ≥ 50,000 sq. ft.	Jun 1, 2023
Covered Non-City Properties ≥ 20,000 sq. ft.	Jun 1, 2024

Annually, benchmarking reports for a given calendar year are due by the following June 1 reporting deadline (e.g., benchmarking reports for calendar year 2024 were due by June 1, 2025.)

The City of Ann Arbor Office of Sustainability and Innovations (OSI) manages the implementation of the Benchmarking Ordinance, dedicating 0.5 FTE to this work. OSI conducts outreach to Covered Properties, provides direct support with utilizing the ENERGY STAR Portfolio Manager (ESPM) benchmarking tool, assists in accessing data from utilities serving Ann Arbor, and reviews benchmarking reports to identify and communicate issues that must be addressed for compliance.

Under the ordinance, both City-owned properties and private properties that meet the ordinance's eligibility criteria are required to comply. Metrics for City Covered Properties (municipal properties) and Non-City Covered Properties (privately-owned properties) are assessed in this report, together.

2024 Calendar Year Results

Participation Rates

For the June 1, 2025 reporting deadline, for which Covered Properties submitted benchmarking reports for calendar year 2024, overall participation[1] in the ordinance surpassed 90%. Multifamily and office properties are the most common properties covered by the ordinance. Multifamily properties account for about 37% of participating properties and 56% of total participating gross floor area (GFA). Office properties account for about 25% of participating properties and about 15% of participating GFA. Figure 1, below, shows the percentage of total participating properties and total participating GFA accounted for by properties' largest property use

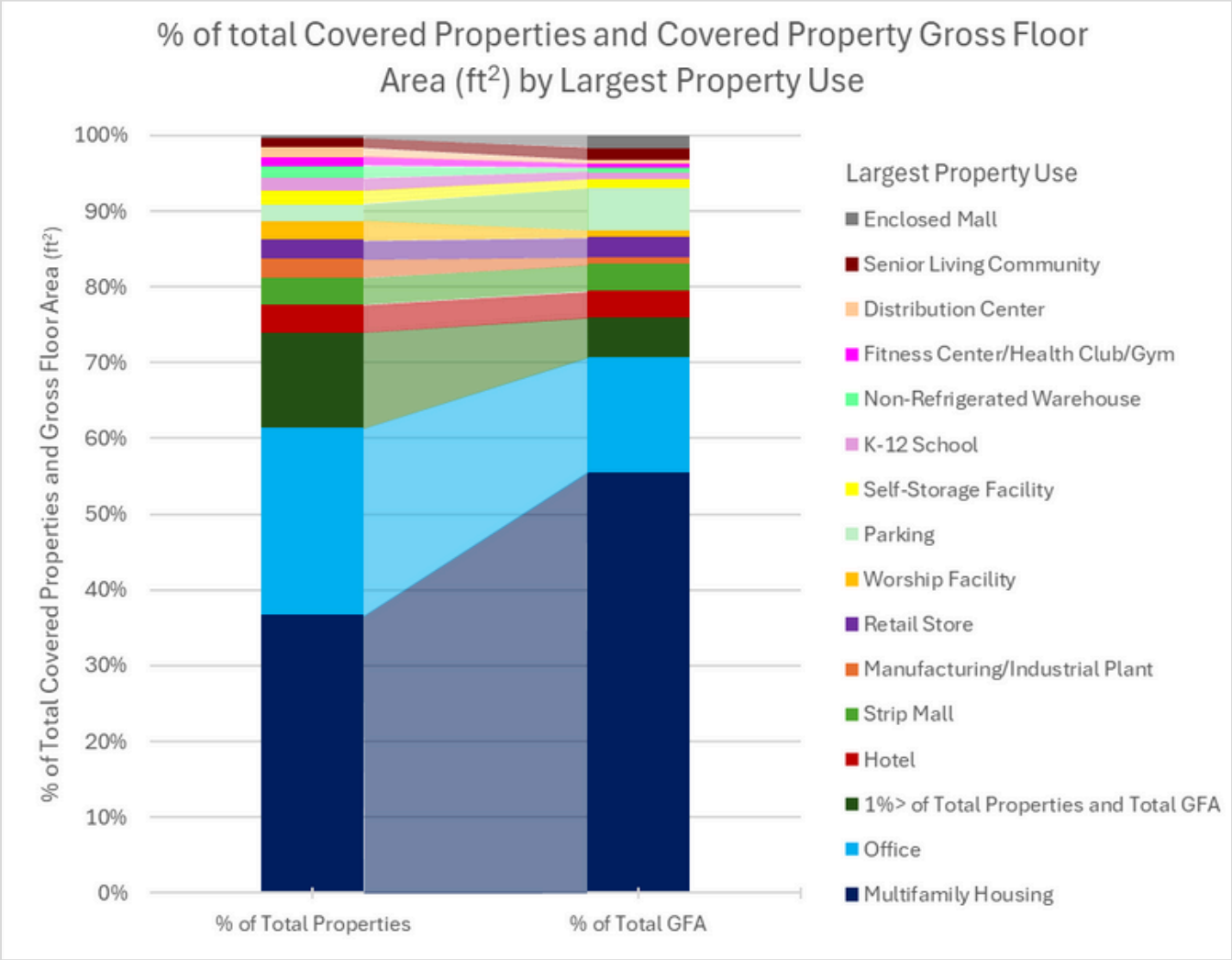

Figure 1. % of total participating properties and total participating gross floor area (ft2) accounted for by properties' largest property use.

[1] Covered Properties are considered "participating" in the ordinance when they have manually or automatically submitted one or more required reports, regardless of their compliance status. Additional properties are in the process of benchmarking, but these entities have not yet submitted a report to the City and, as such, their data is not included in the analysis that follows.

2024 Calendar Year Results

Compliance Rates

Overall compliance[2] is 83%, with overall participation at 90%. Figure 2, below, shows overall participation and compliance rates for the June 1, 2024 reporting deadline (for calendar year 2023) and June 1, 2025 reporting deadline (for calendar year 2024). Comparable sets of properties submitted reports for only these two years, thus far.

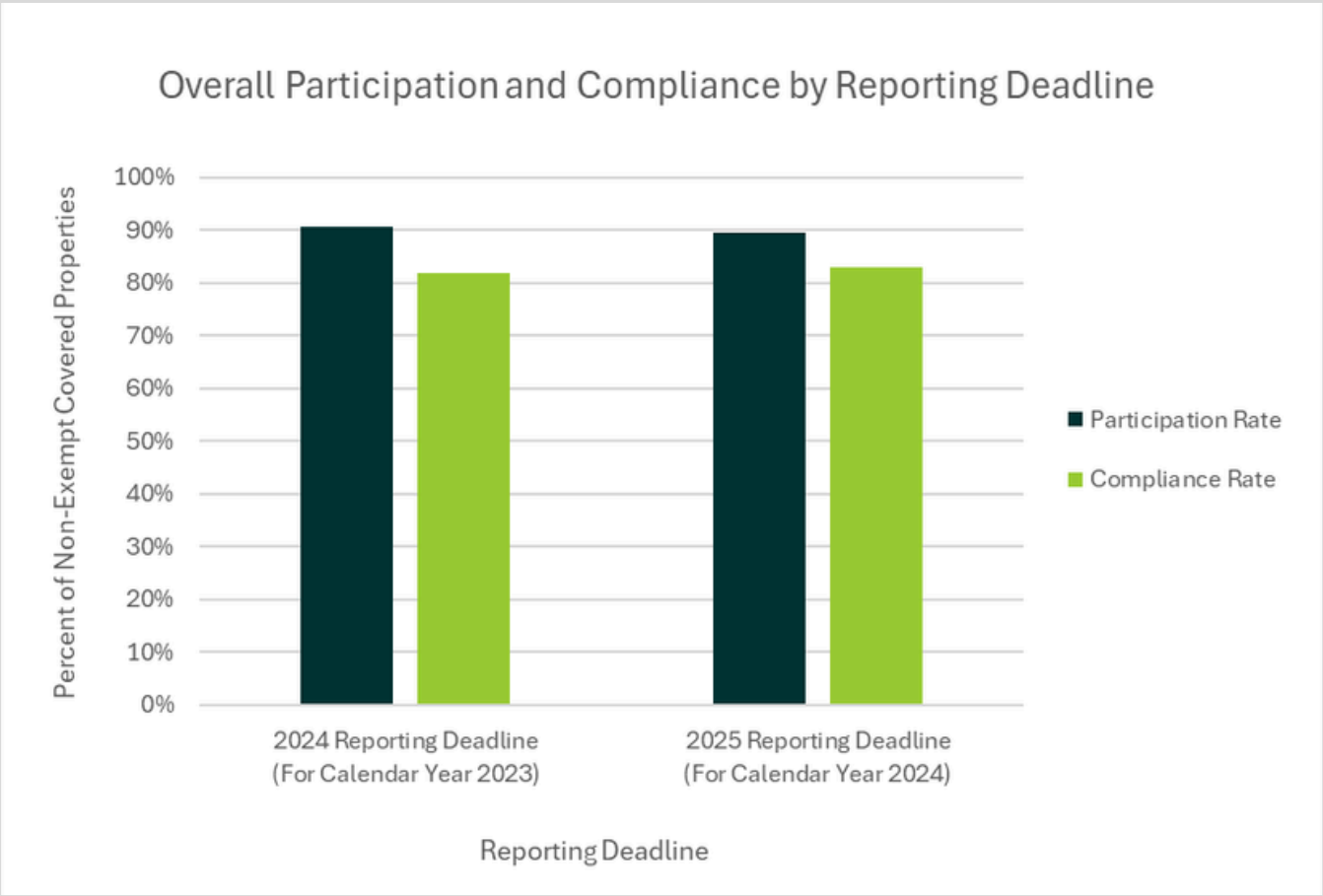

Figure 2: Overall participation and compliance rates for the June 1, 2024 reporting deadline (for calendar year 2023) and June 1, 2025 reporting deadline (for calendar year 2024.)

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2024 Calendar Year Results

Source Energy Use Intensity (EUI)

Energy use intensity (EUI) is the quantity of energy a property uses per unit of gross floor area (GFA) (i.e., total energy usage is divided by the property's GFA). ESPM tracks site and source EUI, making calculation of this variable easy and informative. Site energy is the annual on-site energy consumption of a property, regardless of the source. Source energy use is the total amount of raw fuel that is required to operate a property, including losses that take place during generation, transmission, and distribution of the energy. EPA considers source EUI to be the best way to quantify the energy performance of commercial properties.

In addition to calculating total energy use, it is important to weather normalize data to understand any possible weather-related variabilities. Weather normalized energy is the energy use a property would have consumed during 30-year average weather conditions. Figures 3-5, below, show weather normalized source EUI by gross floor area, largest property use, and year built for all properties who submitted complete and accurate reports for calendar year 2024.

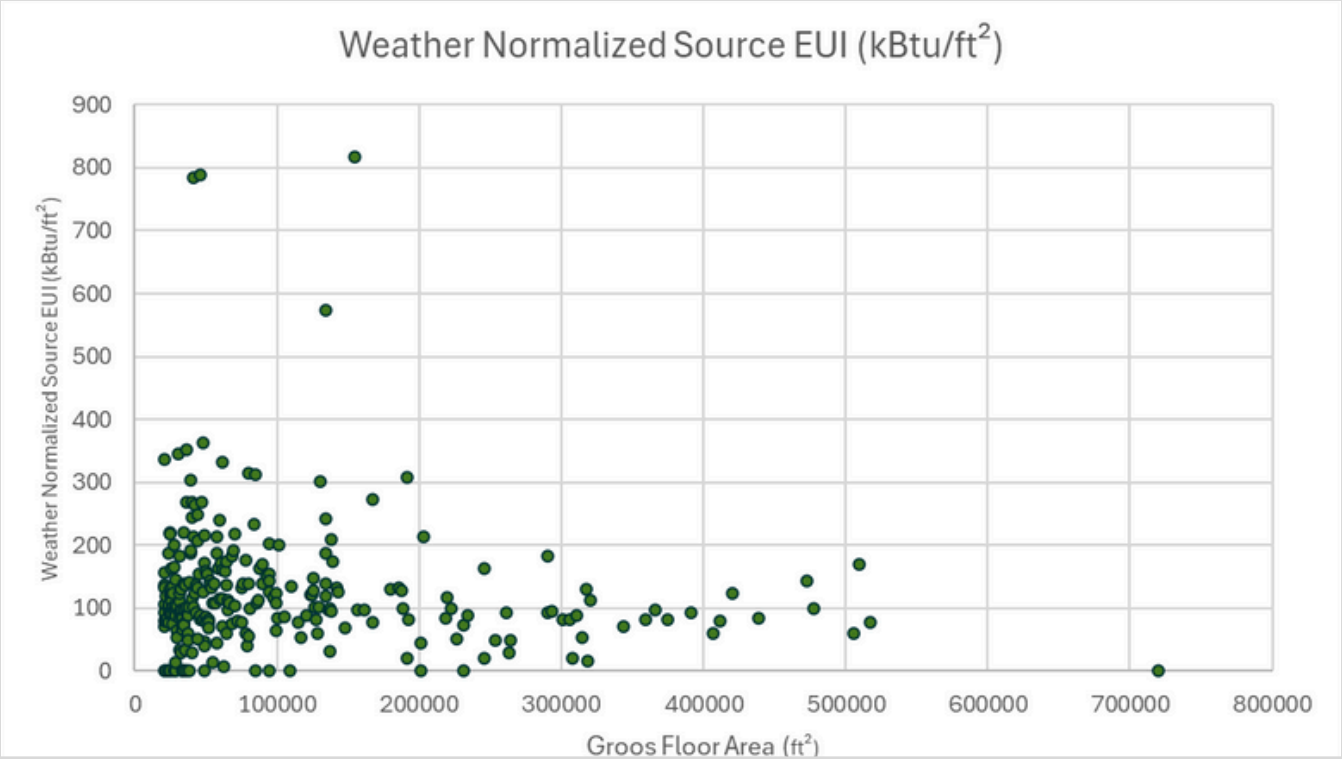

Figure 3. Weather normalized source energy use intensity by source by gross floor area (kBtu/ft²) for compliant properties.

2024 Calendar Year Results

Source Energy Use Intensity (EUI)

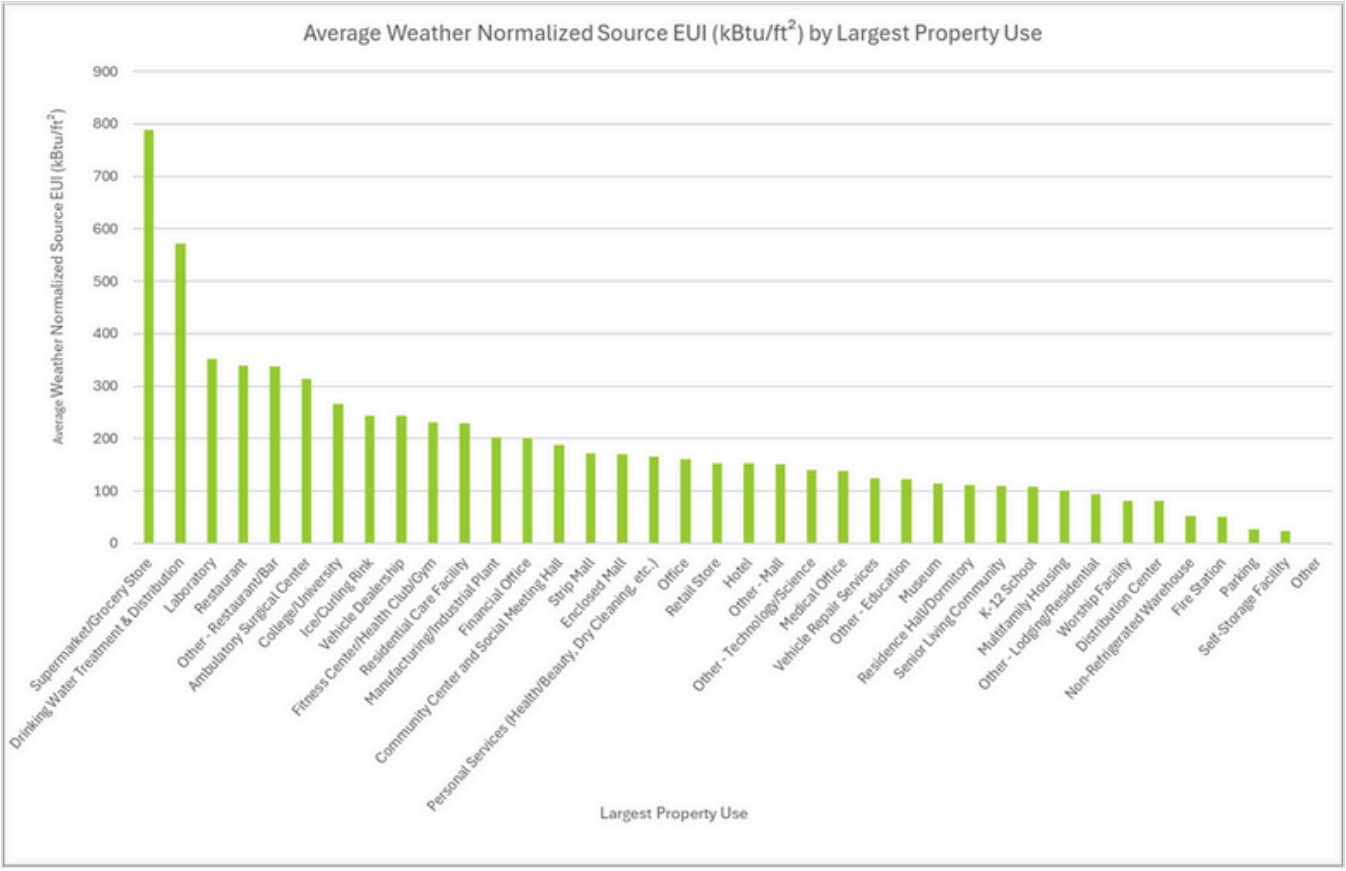

Figure 4. Average weather normalized source energy use intensity (kBtu/ft²) by largest property use for compliant properties.

2024 Calendar Year Results

Source Energy Use Intensity (EUI)

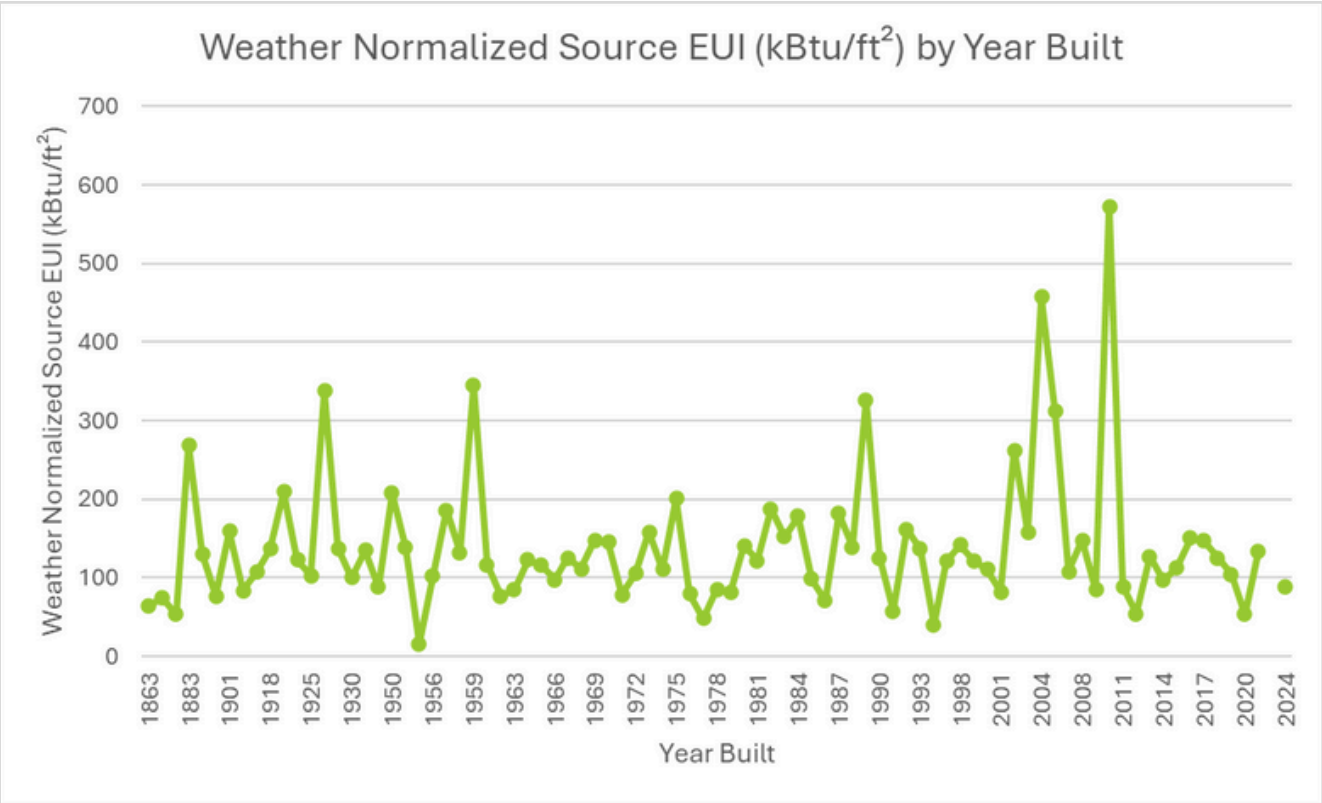

Figure 5. Average weather normalized source energy use intensity (kBtu/ft²) by year built for compliant properties.

2024 Calendar Year Results

Water Consumption Statistics

Water use intensity (WUI) is the total water usage at a property divided by the property's gross floor area (GFA). Total water use includes indoor and outdoor water use. The reporting of water usage is required in the City's Energy and Water Benchmarking Ordinance to help understand usage patterns and opportunities for efficiency. Figures 6-8, below. show WUI by GFA and largest property use, as well as total water use by largest property use for all properties who submitted complete and accurate reports for calendar year 2024.

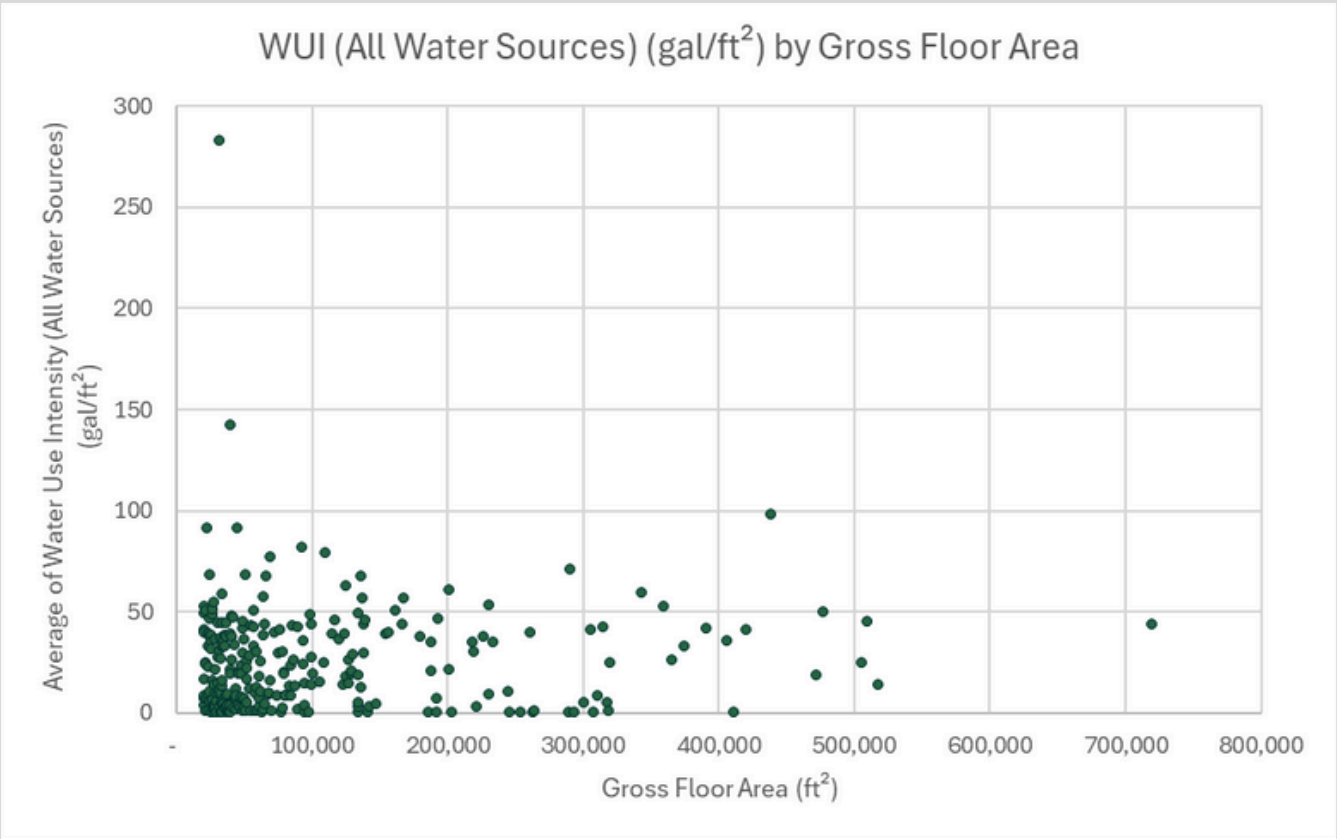

Figure 6. Total water use intensity (gal/ft²) (from potable, reclaimed, well, and other water sources) by gross floor area (ft²) for compliant properties.

2024 Calendar Year Results

Water Consumption Statistics

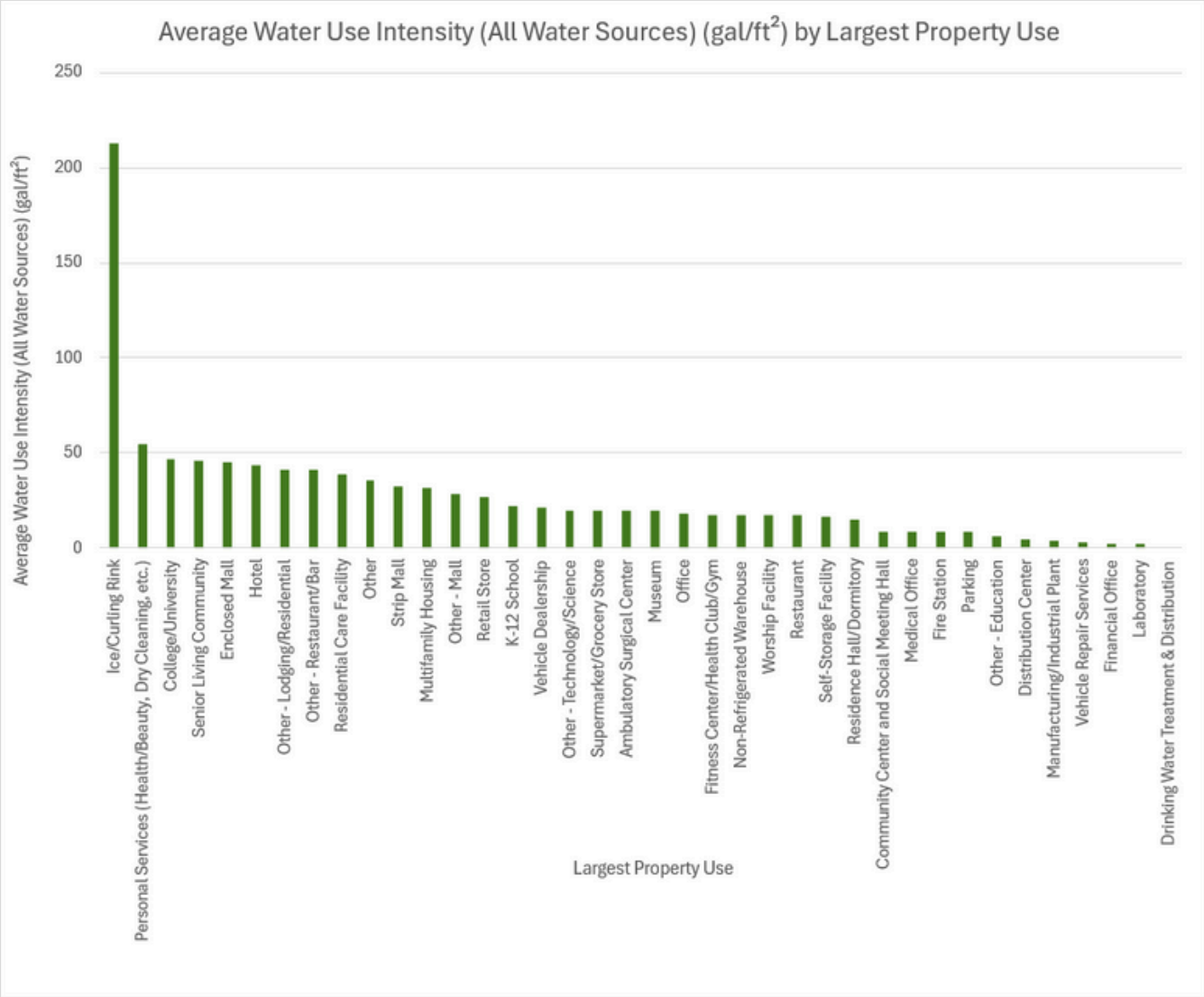

Figure 7. Average total water use intensity (gal/ft2) (from potable, reclaimed, well, and other water sources) by largest property use for compliant properties.

2024 Calendar Year Results

Water Consumption Statistics

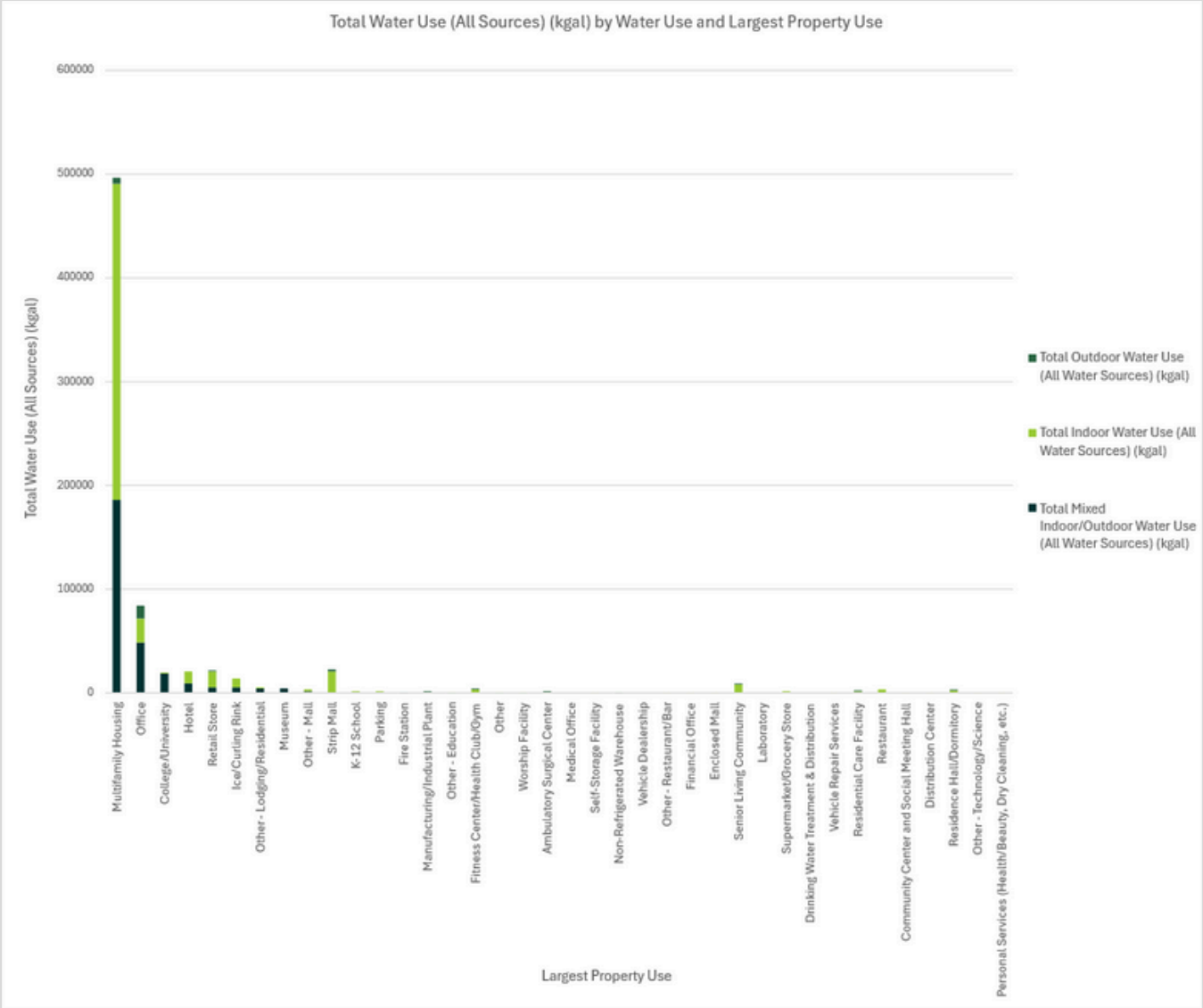

Figure 8. Total water use (kgal) (from potable, reclaimed, well, and other water sources) by water use (indoor, outdoor, and mixed indoor/outdoor) and largest property use for compliant properties.

Data Accuracy

Calendar year 2024 data was more accurate than data in previous calendar years. Additionally, with greater participation and compliance and less time dedicated to outreach, OSI staff dedicated more time to reviewing the data quality of individual reports.

DTE

Energy data provided by DTE continues to be accurate. However, while the data received from DTE is accurate, due to the process required to obtain whole-building or whole-property energy data from DTE, data completeness is a bigger challenge than the accuracy of the data provided.

Constellation

Energy data provided by Constellation Energy continues to be accurate. Constellation Energy also provides more complete data than DTE. Factors that could contribute to the relative completeness of Constellation Energy's data compared to DTE are that much fewer properties use Constellation Energy, most only use Constellation Energy for natural gas, and gas is generally metered at the property or building level, rather than at the tenant/unit level. This results in fewer properties reporting data from Constellation, and each property has fewer Constellation meters to report.

City Water Data

Water data provided by the City of Ann Arbor continues to be accurate. Water usage data is generally complete. There are consistent gaps in water usage data when physical meters or meter transmission units (MTUs) are replaced. However, as the City of Ann Arbor is the water utility for all Covered Properties, data quality issues can be more easily addressed than data issues with DTE or Constellation Energy.

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Data Accessibility

DTE

DTE is the largest energy utility serving the City of Ann Arbor. DTE offers four ways to obtain the aggregated whole building or property data, including tenant data, as required by the Benchmarking Ordinance.

1. Tracking energy usage manually via bills. This is only practical for Covered Properties whose owner or manager pay bills directly, or those who have a small number of tenants.
2. Requesting data directly from DTE by email. To the best of OSI's knowledge, no property has obtained their DTE usage data this way, but this is one possible pathway to accessing data.
3. Downloading data from a property's online Landlord Account. This is only an option for properties that have Landlord Accounts. Multifamily properties generally have Landlord Accounts, but some do not have online accounts, at all. Commercial properties rarely have Landlord Accounts.
4. Enrolling in DTE's Energy Data Hub, a free data portal that provides aggregated whole-building or property data, back to January 2021. The Energy Data Hub can automatically upload data to ESPM. Nearly three-quarters of Covered Properties complying with the Benchmarking Ordinance use the Energy Data Hub to obtain their data. While the tool itself greatly assists Covered Properties in complying with the ordinance, enrollment in the Energy Data Hub is challenging.

   Additionally, in April 2025, the MPSC changed the minimum data aggregation threshold for regulated utilities to 15 customers, up from the previous threshold of six. If a property, or any aggregated data set, has fewer than 15 customers, each customer needs to give authorization for the data set to be aggregated in the Energy Data Hub. This threshold is unusually high for a statewide or utility data aggregation threshold.

Data Accessibility

Constellation

Constellation Energy is the most frequently used "choice" energy provider in Ann Arbor but supplies energy to a significantly smaller number of properties than DTE. Constellation offers no data automation for properties receiving energy from the company. However, properties can obtain data manually in three ways.

1. Entering energy usage from individual bills. This is only practical for Covered Properties whose owner or manager pay bills directly, or those who have a small number of tenants.
2. Downloading data from online accounts.
3. Requesting usage reports directly from Constellation through one of the company's representatives. Obtaining energy usage data from a Constellation Energy representative is easier and quicker than from DTE, and the data is provided in an easy-to-use format.

City of Ann Arbor (Water)

The City of Ann Arbor is the water utility for all Covered Properties required to comply with the Benchmarking Ordinance. Water usage data can be obtained in three ways.

1. Entering water usage from individual bills. This is only practical for Covered Properties whose owner or manager pay bills directly, or those who have a small number of tenants.
2. Downloading energy usage data from AquaHawk, a free water usage dashboard available to all City of Ann Arbor Water customers.
3. Automatic data uploaded by the City. Covered Properties can set up their virtual water meters in ESPM with meter-specific identifying numbers and connect their account with one operated by the City. This City-operated account automatically uploads monthly water usage, meter by meter.

Year-Over-Year Changes and Trends

Due to the Benchmarking Ordinance phasing in Covered Properties by square footage, calendar year 2023 and 2024 are, thus far, the only years for which comparable sets properties are reporting.

Additionally, one segment of Covered Properties is being phased into the ordinance's requirements in 2026 – residential condominium associations. Residential condominiums were previously unable to obtain the DTE data required to benchmark. This data is now available to residential condominiums who will submit their first report by June 1, 2026 for 2025 calendar year energy and water usage. This will affect overall year-over-year metrics for the next annual report. However, as all condominiums are considered multifamily properties, the impact they have on overall metrics can be easily assessed. OSI will continue to assess year-over-year trends as additional years of comparable data are added.

More granular investigation into these year-over-year trends should offer more insight into overall portfolio trends. It will be important to identify if broad progress is being made, if specific sectors are making more progress than others, if certain large energy users are making progress, if utility fuel mixes or on-site renewables are influencing these trends, or if a different causal factor can be identified. Figures 9-13, below, show year-over-year metrics for all properties who submitted complete and accurate reports for each calendar year of data.

Year-Over-Year Changes and Trends

Energy Use Intensity (EUI)

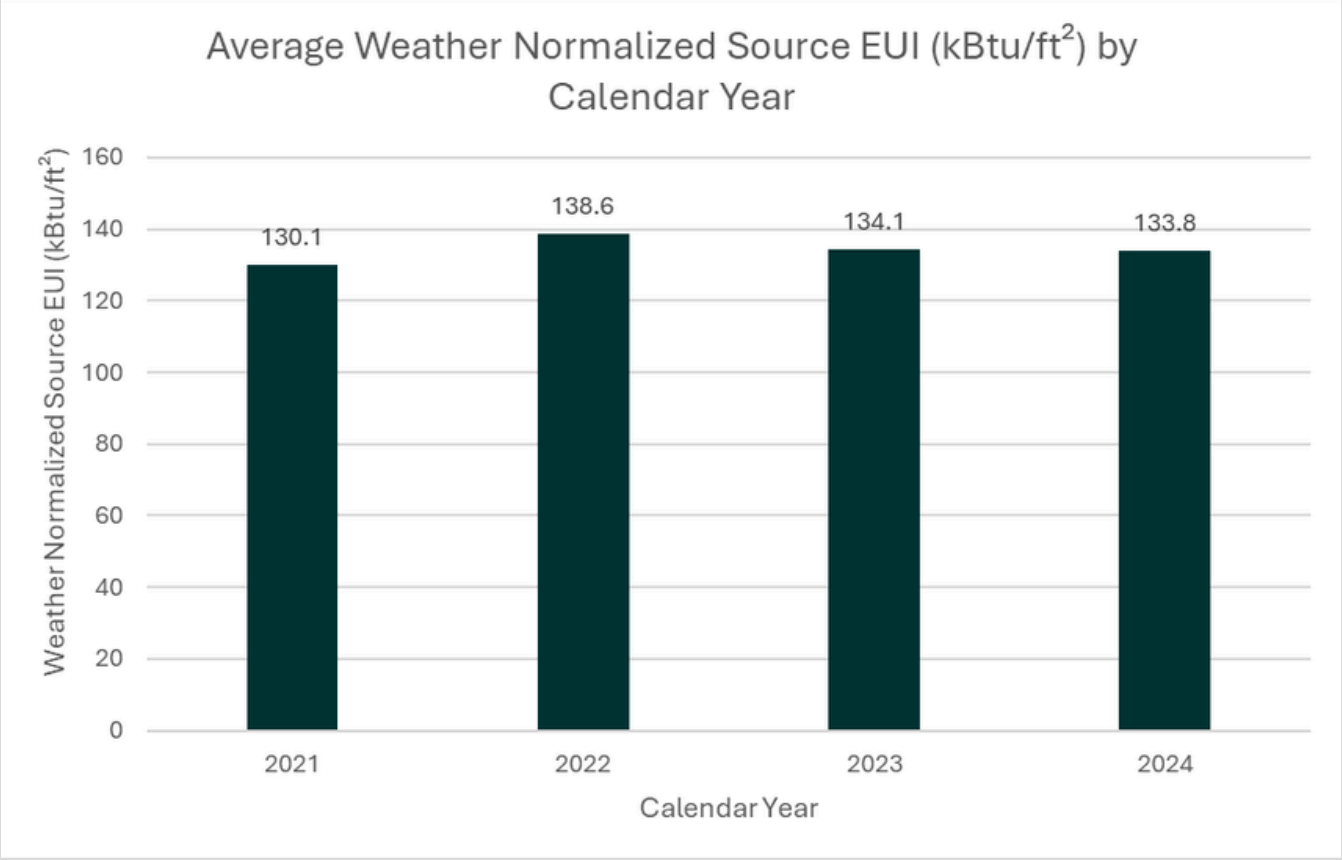

Figure 9. Average weather normalized source EUI (kBtu/ft²) by calendar year for compliant properties.

Year-Over-Year Changes and Trends

Water Use Intensity and Total Water Use

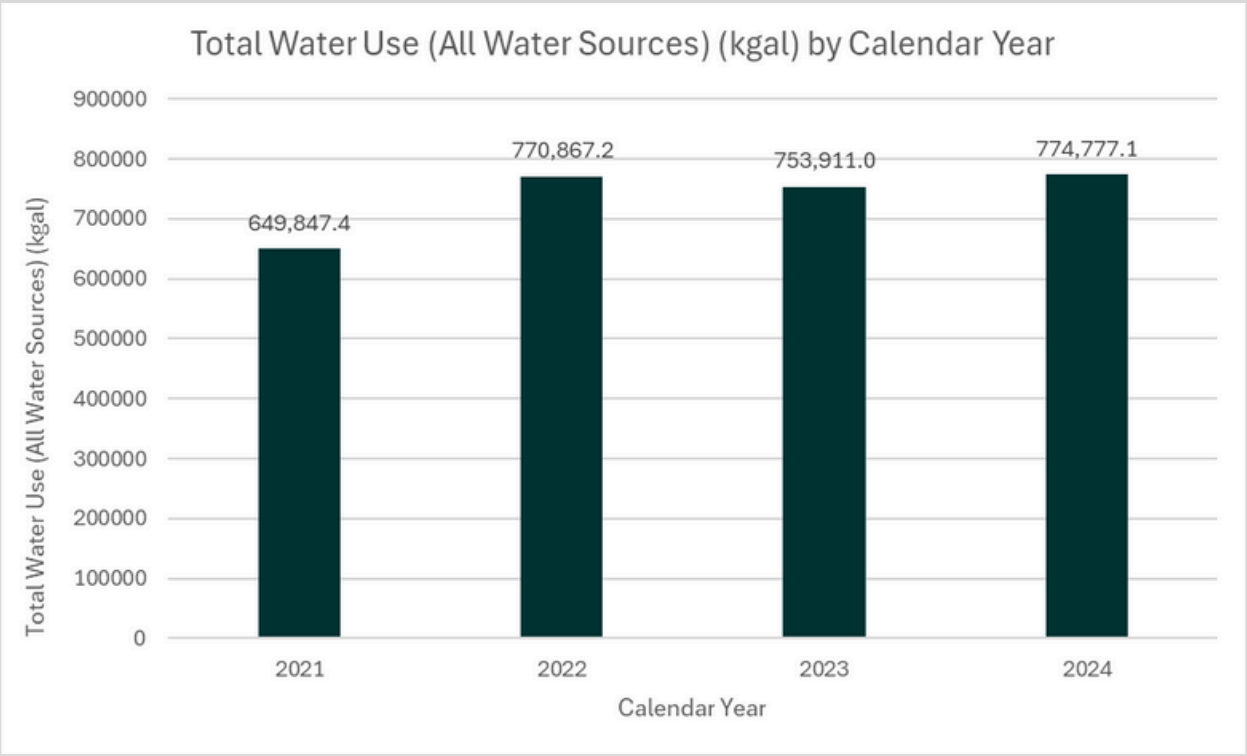

Figure 10. Total (indoor, outdoor, mixed indoor/outdoor) water use (kgal) by calendar year for compliant properties.

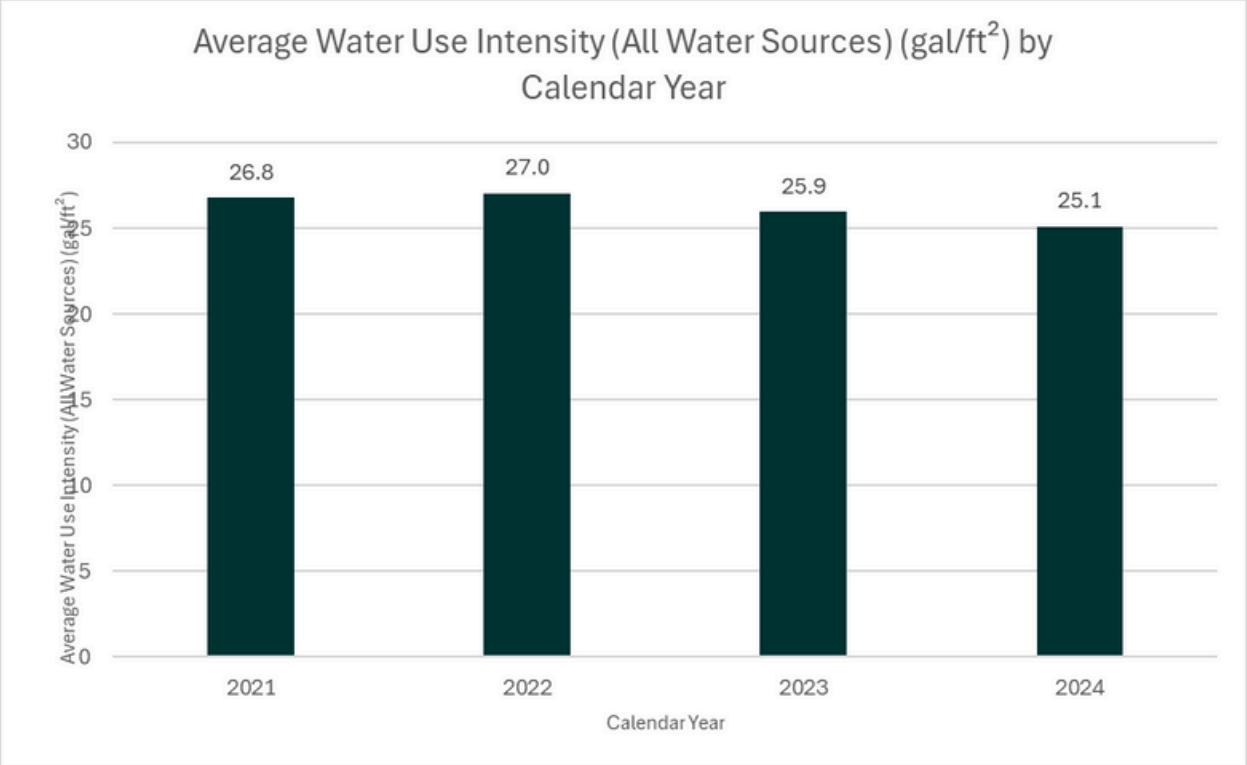

Figure 11. Average total (indoor, outdoor, mixed indoor/outdoor) water use intensity (gal/ft²) by calendar year for compliant properties.

Year-Over-Year Changes and Trends

GHG Emission Intensity and Total GHG Emissions

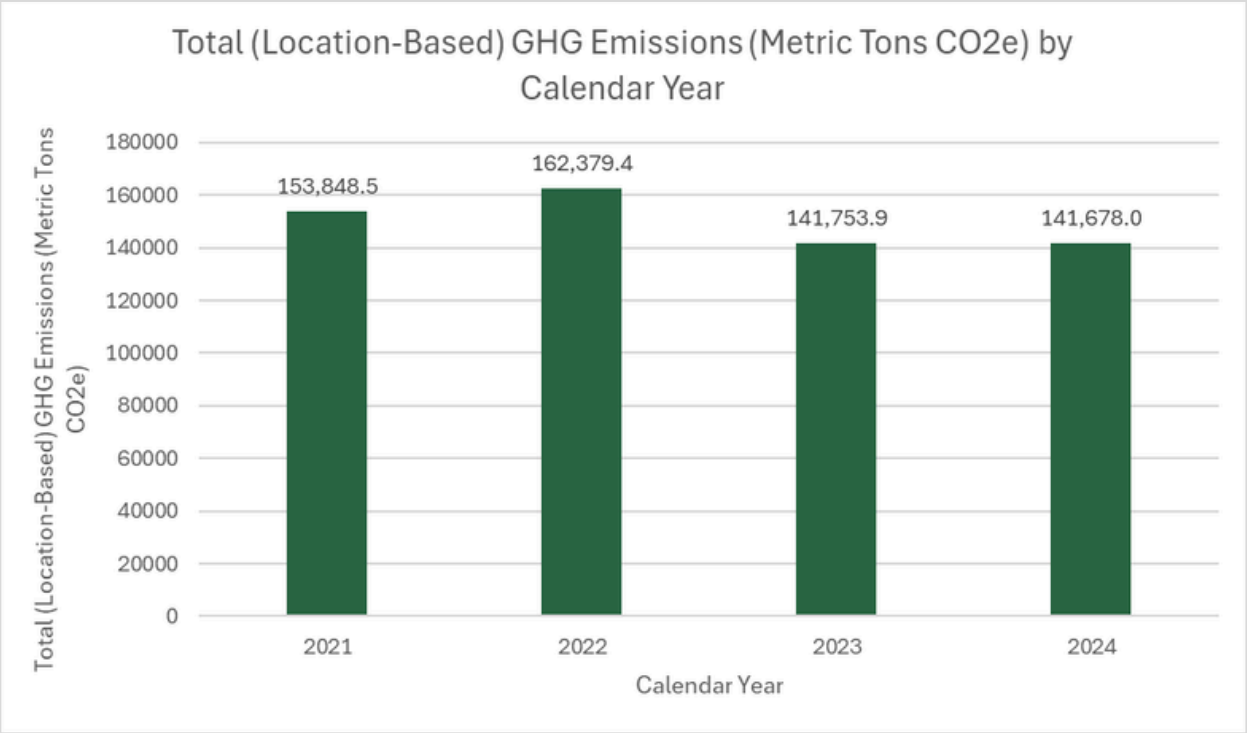

Figure 12. Total GHG emissions (Metric Tons CO2e) by calendar year for compliant properties. “Location based" emissions use regional emissions factor for electricity, and national factors for district fuels.

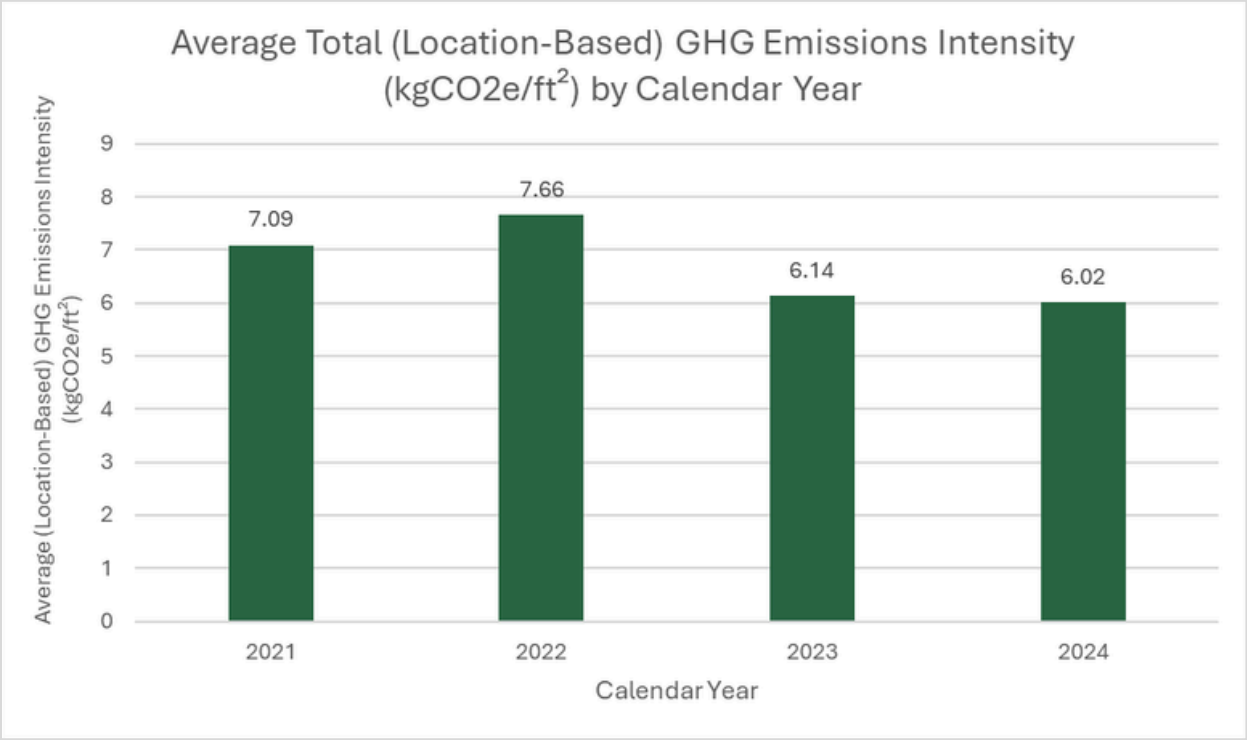

Figure 13. Average total GHG emissions intensity (kgCO2e/ft²) by calendar year for compliant properties.

Looking Forward

Final phase-in of Covered Properties

Residential condominiums are the last segment of Covered Properties to begin reporting. Once residential condominiums are phased in, portfolio-wide metrics will have comparable data sets to better track year-over-year metrics.

Deeper dives into the data

With high participation and compliance, both of which are still increasing, data is complete enough to investigate potential trends across all properties reporting, within specific property uses, and within specific properties' reports.

Launching a public data dashboard

New in 2026, OSI has launched a public data dashboard showing individual annual Covered Property benchmarking reports. This data will show aggregate information for properties with three or more tenants. Only compliance and exemption statuses are released for properties with one or two tenants.

Incorporating data into future programming

With data accuracy and completeness continuing to increase, OSI will look for opportunities to use this data to inform future programming and identify internal or external resources that may be beneficial to specific Covered Properties.

More information about the City's Energy and Water Benchmarking Ordinance can be found on the City's of Ann Arbor's website.

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