Washington State Department of Commerce

Clean Buildings Performance Standard Legislative Report: Early Adopter Incentive Programs

This report satisfies the requirements in section 4(10) of Chapter 285, Laws of 2019.

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Report to the Legislature

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BUILDINGS UNIT

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Acknowledgments

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Executive summary

Overview

Washington's Clean Buildings laws (Chapter 285, Laws of 2019[1] and Chapter 177, Laws of 2022[2]) established a phased approach to building energy performance standards for non-residential and multifamily buildings over 20,000 square feet. To support early compliance and reduce financial barriers, the Washington State Department of Commerce manages four primary incentive programs totaling $284.5 million, including $225 million in utility tax credits and $59.5 million in Climate Commitment Account (CCA) funding. The Clean Buildings laws require that these programs are launched in July 2021 (for Tier 1) and July 2025 (for Tier 2). These programs are designed to reduce energy use intensity (EUI) and greenhouse gas emissions in large existing buildings.

This legislative report was prepared in accordance with RCW 19.27A.220[3] and provides an overview of Washington State's Clean Buildings Tier 1 and Tier 2 Early Adoption Incentive Programs, their role in supporting compliance with the Clean Buildings Performance Standard (CBPS), and ways to better meet greenhouse gas reduction goals.

Tier 1 and Tier 2 Early Adoption Incentive Programs

- **Tier 1 Early Adoption Incentive Program ($75 million)** – launched in 2021, supports compliance for buildings over 50,000 sq ft. Initial participation was limited by eligibility constraints, but recent improvements have increased participation. As of June 2025, $16.1 million has been reserved. These participating buildings have reported measurable energy savings and notable reductions in energy costs, underscoring the program's positive impact.
- **Tier 2 Early Adoption Incentive Program ($150 million)** – launched in July 2025, supports compliance for buildings between 20,000 and 50,000 square feet, including multifamily properties. The program anticipates receiving about 15,000 applications by the July 2027 compliance deadline. As of December 2025, $349,607 has been reserved, supporting compliance for 18 buildings.

Key findings

- **Energy and emissions impact:** Early adopter incentive programs drive substantial reductions in energy use. For example, Overlake Hospital's retrofit alone saves over 49 million kBTUs annually, which is equivalent to the amount of energy needed to power 1389 average American homes annually.
- **Demand exceeds available funding:** Program interest far outpaces available resources. The clean buildings performance grants program received significant interest from building owners because it provided funds for retrofits that were not covered by the early adoption programs. For example, in the 2025 solicitation the program received two times more applications than the $45M in funding available.
- **Access and equity gaps:** Some building owners cannot receive incentives due to lack of utility participation. Smaller utilities are not required by law to offer incentives, reducing access in underserved communities in rural areas.
- **Administrative capacity to apply for funding:** The launch of multiple new programs required building owners to apply to programs individually rather than submitting one application. Commerce plans to test a new combined approach to applications with 2025-2027 biennium funding.

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[1] State of Washington. Chapter 285, Laws of 2019.
[2] State of Washington. Chapter 177, Laws of 2022.
[3] State Energy Performance Standard- Early Adoption Incentive Program- Report to the Legislature. RCW 19.27A.220: State energy performance standard—Early adoption incentive program—Report to the Legislature.

Recommendations

- Expand participation requirements to all utilities, regardless of size, to ensure equitable access to incentives statewide.
- To achieve compliance for covered buildings in the state, ongoing investment will be needed. Additionally, restructuring the early adoption incentive program requirements based on current law could enable more funding for compliance, energy saving retrofits, and emission reductions within existing available resources.
- Support financing mechanisms to address high upfront retrofit costs, such as low-interest loans or Green Bank lending.
- Continue enhancements to the Clean Buildings Portal for streamlined access and user experience.
- Scale up technical assistance through the new BEACON Fellowship Program, to provide free, local capacity to building owners needing assistance with compliance.
- Update the CBPS with a greenhouse gas (GHG) target and then expand incentive programs to include GHG reduction activities.

Introduction

Background

Residential and commercial buildings are Washington's second-largest source of greenhouse gases, accounting for 25% of statewide emissions. In 2019, the Legislature found that to meet the statewide greenhouse gas emissions limits in RCW 70A.45.020[4], the state must require performance standards for existing large buildings.

To improve energy efficiency in new and existing buildings, and to maximize reductions of greenhouse gas emissions from the building sector, the Legislature passed the Clean Buildings Laws in 2019 (Chapter 285) and 2022 (Chapter 177). Lawmakers sought to:

- Create an energy performance standard for non-residential buildings larger than 50,000 square feet; and
- Require energy management planning, operations and maintenance, and the tracking of energy use over time for non-residential and multifamily buildings over 20,000 square feet.

The Clean Buildings Performance Standard (CBPS, or the Standard) consists of American Society of Heating Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 100-2018 Energy Efficiency in Existing Buildings[5], with state amendments WAC 194-50[6]. The standard applies to Tier 1 and Tier 2 covered buildings, along with buildings connected to a participating district energy system. Tier 1 buildings are larger than 50,000 square feet, while Tier 2 buildings are between 20,000 and 50,000 square feet, including all multifamily residential buildings larger than 20,000 square feet.

Owners of Tier 1 and Tier 2 buildings are required to benchmark energy use while also developing and implementing an energy management plan and operations and maintenance program. Only Tier 1 buildings have a required energy performance metric that can be met in one of the following ways:

- Meeting the energy use intensity target set by the state
- Meeting the investment criteria pathway by conducting an energy audit, lifecycle cost analysis, and implementing all cost-effective energy efficiency measures
- By reducing energy use by 15% from the baseline
- By replacing existing fossil fuel-consuming space conditioning equipment with electric heat pump equipment
- Filing for and being granted an exemption

The compliance due date for the buildings to meet the standard is dependent on the size of the buildings. The compliance dates for Tier 1 sized buildings are based on the building size and begin in 2026 for the largest buildings (over 220,000 square feet), continuing through 2028. The single Tier 2 compliance deadline is July 1, 2027.

The law required creating a database of covered buildings in the state, notifying building owners of the requirements, establishing an incentive program for early adopters of the standard, and providing customer support to the industry.

The Tier 1 incentive program launched July 2021 to support the largest buildings in the state that had to comply first. The Tier 2 incentive program was launched next in July 2025. Starting in the 2023-2025 biennium, the state funded two new programs from the Climate Commitment Account including Energy Audits for Publicly Owned

[4] State of Washington. Greenhouse gas emissions reductions- Reporting requirements.
[5] American Society of Heating Refrigerating and Air-Conditioning Engineering (ASHREA). Energy Efficiency in Existing Buildings.
[6] Washington State Department of Commerce. Adoption and amendment of ASHREA Standard 100, 2018.

Buildings and the Clean Buildings Performance Grants Program. Total funding for these four programs includes $284.5 million.

The four programs are funded by utility tax credits and Climate Commitment Act (CCA) funding as follows:

- **Tier 1 Early Adopter Incentive Program ($75 million)** - Commerce created and administers a Clean Buildings Portal application process that allocates incentives to be paid by utilities to the building owners. The utility then applies for a tax credit for making the incentive payment to the building owner.
- **Tier 2 Early Adopter Incentive Program ($150 million)** - Commerce created and administers a Clean Buildings Portal application process that allocates incentives to be paid by utilities to the building owners. The utility then applies for a tax credit for making the incentive payment to the building owner.
- **Clean Buildings Performance Grants Program (CBPG) ($45 million)**– Provides competitive funding for energy upgrades in Tier 1 and public Tier 2 buildings. In 2025, Commerce received applications totaling $105.5 million in requested funding, or twice the amount available. Commerce awarded $45 million in CCA funding to 71 projects. To achieve high compliance rates statewide, additional and ongoing state investment will be needed.
- **Audit Incentive for Public Buildings Program ($14.5 million)**– Funds investment-grade energy audits to identify cost-effective energy efficiency measures in publicly owned Tier 1 buildings. All funds were successfully allocated, primarily to schools and colleges. These audits support long-term planning and future retrofitting. Demand continues for this program. To identify cost-effective improvements in privately owned buildings, that state could consider creating a similar program for privately owned buildings.

Investments from the CCA have accelerated greenhouse gas emissions reductions from the built environment and identified cost-effective actions that publicly owned buildings can implement. These investments result in operating cost savings over time that exceed the upfront cost of installing these improvements, reducing demand on the state's operating budget into the future.

While CCA funding has been critical to catalyze these emissions reductions, revenue into the CCA is expected to decline as the state's largest emitters find a path to lower emissions over time. Identifying alternate or additional fund sources and continuing to leverage available financing mechanisms will be imperative.

Progress to Date on Early Adopter Incentive Programs

Tier 1 Early Adopter Incentive Program

RCW 19.27A.220 requires Commerce to administer an Early Adopter Incentive Program to encourage proactive compliance with the Clean Buildings Performance Standard. The Legislature authorized $75 million for participating utilities to offer as incentives to building owners for early compliance. Eligible buildings can also receive other funding like utility conservation incentives and pursue other financing mechanisms. This program reimburses building owners for making energy-saving retrofits that support the goal of reducing greenhouse gas emissions. Combined, these efforts to date will save over 212 million kBTUs of energy annually, resulting in the reduction of greenhouse gas emissions (see Appendix A).

To be eligible for the incentive program, buildings must be larger than 50,000 square feet GFA (gross floor area), and be served by at least one participating electric utility, gas company, or thermal energy company. Buildings must be at least 15 energy use intensity (EUI) over the target by building type. Buildings demonstrating early compliance with the standard originally were eligible to receive 85 cents per GFA. Participating utilities pay this incentive directly to building owners and then claim the incentive amount against their tax liability within two calendar years.

Commerce launched the Early Adopter Incentive Program in July 2021. The program experienced a lower-than-expected application rate for several reasons, based on stakeholder feedback. 85 cents per square foot is, in some instances, just a small portion of the overall investment needed.

HB 1976, 2023 authorized Commerce to increase the base incentive payment. Commerce hosted a listening session to solicit feedback from building owners, utility providers, and energy consultants on proposed enhancements to the program. Based on those discussions, Commerce now awards a higher incentive that has two parts, one based on building size, and one based on the energy savings of the project:

- Part 1: $2 per square foot
- Part 2: 5 cents per kBTU of energy saved beyond the 15 kBTU/sf/year minimum EUI reduction required by the Early Adopter Incentive Program
- The maximum incentive payment is 50% of the total project cost to implement the energy saving retrofits

These changes, combined with enhanced outreach to potential applicants, successfully increased applications. Buildings over 220,000 square feet had to submit their incentive applications by June 1, 2025. Looking forward, two deadlines are coming for the remaining Tier 1 cohorts of buildings. Commerce expects to receive most applications near these deadlines of June 1, 2026, and June 1, 2027. To date, the average incentive payment is $2.84 per square foot. To date, over $16.1 million of available funding for Tier 1 has been reserved by building applicants.

Hospitals (5 applications) and jails (4 applications) comprise the majority of applications to the Tier 1 early adopter incentive program because of the high energy use intensity for these building types. Following are examples of incentive program recipients and associated energy savings:

- Overlake Hospital (Bellevue) – $2,209,883: predicted Annual Savings kBtu- 42,538,452
- Spokane County Jail (Spokane) – $1,434,970 (tentative award): predicted Annual Savings kBtu- 10,156,544
- Providence St. Mary's Hospital (Walla Walla) – $1,395,756: predicted Annual Savings kBtu- 20,479,974
- Clallam Bay Correctional Jail (Clallam Bay) – $1,316,726: predicted Annual Savings kBtu- 22,734,726
- Providence Edmonds Hospital (Edmonds) – $1,076,014: predicted Annual Savings kBtu- 12,099,432
- Providence Holy Family Hospital (Spokane) – $1,015,311: predicted Annual Savings kBtu- 9,454,805

Overlake Hospital was an early applicant to the Tier 1 Early Adopter incentive program and an especially notable project. The project saved the organization money on utility bills with energy savings over 49 million kBtu annually as they continue to make energy efficiency improvements. Incentive funding supported energy saving retrofits of the chilled water system, HVAC controls, condenser water system, lighting, boiler controls, insulation, and backup generator. This project is featured in Appendix A.

Tier 2 Early Adopter Incentive Program

The Tier 2 Incentive Program was included as part of the Clean Buildings expansion legislation, Chapter 177, Laws of 2022. The Legislature authorized $150 million to support Tier 2 building owners who have demonstrated compliance with Tier 2 reporting requirements. Tier 2 buildings are between 20,000 and 50,000 square feet and include all multifamily buildings larger than 20,000 square feet. These buildings must comply by July 1, 2027 by completing and submitting an energy benchmarking report, an energy management plan, and an operations and maintenance program. The base incentive is established at 30 cents per gross square foot of floor area, excluding parking, unconditioned, or partially conditioned spaces. An enhanced incentive of 75 cents per gross square foot has been developed for multifamily residential building owners who commit to anti-displacement provisions and agree not to raise rent due to compliance investments.

The program completed the design and outreach phase in January 2025, including an outreach campaign to utilities. Commerce hosted six listening sessions to hear public feedback for the design and development of program guidelines. The public provided comments on the structure of the program and identified the needs and barriers of the building owners.

The program started accepting applications July 1, 2025, and is expected to receive around 15,000 applications. Awards per building are estimated at $6,000 to $15,000 depending on building size. Early applications indicate that 30 cents per square foot is covering the full cost of compliance for most buildings.

Key accomplishments to date include:

- Completed comprehensive program design after robust public engagement
- Created a new webpage and guidebook to support building owners and the industry
- Launched program July 1, 2025
- As of November 1, 2025, Tier 2 Incentive applications that have been received will reserve an estimated $1.66M in incentives
- 19 incentives have been approved for payment by Commerce

Recommendations

Program specific recommendations

The early adopter incentive programs support building compliance with the Clean Buildings Performance Standard, which will result in the reduction of greenhouse gas emissions across Washington and reduction of operating costs for building owners and their tenants. The incentives are successfully supporting building owners to lower their energy use, but barriers remain and could be addressed to improve outcomes.

The Clean Buildings Workgroup Report[7] published in December 2024 offered two main recommendations for financial support and incentives:

- Explore creative ways to unlock financing for all sectors
- Increase funds in programs that support CBPS compliance and reduce the barriers to accessing public funding opportunities

Legislative actions to improve incentive programs

- **Mandate all utilities participate**. More building owners could access funding for clean buildings compliance if all utilities in the state were required to participate in these programs. Current law states that only utilities serving over 25,000 customers are required to participate. Utilities serving fewer customers can opt in, but are not required to provide incentives. This change would significantly expand access to rural and underserved communities.
- **Reduce eligibility barriers of Tier 1 funding.** Adustments to current law could include:
  - Allow buildings unable to meet EUI reduction targets to access the Tier 1 incentive programs through additional compliance pathways including investment criteria.
  - Allow access to incentive payments earlier in the compliance process. Incentive payments are made after construction is complete and then followed by a 12-18-month verification period. This timeline requires significant upfront capital investment.
  - Reduce the 15 EUI over the target requirement for applicants.
- **Increase scope of Tier 2 funding**. Tier 2 incentives are available to help offset the reporting cost for benchmarking, energy management plans and operations and maintenance programs. Expanding the scope and eligible activities for Tier 2 buildings to include building improvements such as lighting upgrades and HVAC recommissioning would further reduce greenhouse gas emissions and operating costs for Tier 2 buildings.

Enhance and remove barriers to financing compliance with the CBPS

The Tier 1 early adopter incentive program has demonstrated that utility incentives, tax credits, and other grants and loans can be leveraged to significantly lower the cost of clean building compliance activities and reduce emissions and operating costs. The Clean Buildings Workgroup Report from 2024 recommends exploring creative ways to unlock financing for all sectors and reduce the barriers to accessing public funding opportunities. The report references the need to facilitate both public and private sector access to new financing tools such low interest loans and revolving loan programs.

- **Providing low-interest financing for projects upfront.** CBPS Early adopter incentive programs disperse funding after the retrofit or compliance activity is completed, which can complicate project funding if the building owner lacks upfront capital. The Washington State Green Bank could play a pivotal role in addressing this challenge.

[7] Clean Buildings Workgroup Report. December 2024.

- **Providing project financing-related services.** Split incentives occur when those responsible for paying energy bills (for example, a tenant) are not the same entity as those making the capital investment decisions (the landlord or building owner). Incentives are generally provided to building owners who are responsible for compliance with the standard. Additional financing-related services could include:
  - **Green leases.** Assistance could be provided to building owners to support CBPS compliance-related activities and costs into contracts with their tenants. These are sometimes referred to as green lease clauses.
  - **Environmental Upgrade Agreements (EUAs).** EUAs provide support for building owners to access commercial funds for projects and share the project costs (and benefits) with tenants.

Improving the building owner experience

Commerce is working to make it easier for building owners to navigate our incentive programs. Right now, the many funding sources and programs can seem difficult to navigate for building owners across the state. For example, funding comes from federal programs, the state Climate Commitment Act, and utility tax credits.

- **Launch unified application process.** Commerce will launch a new type of solicitation in 2025 that will be a one-stop shop for building owners working towards compliance. The new, combined solicitation will enable building owners to apply for multiple funding opportunities within one application.
- **Continue enhancements to the Clean Buildings Portal**. Building owners apply for the early adopter incentive programs using the Clean Buildings Portal, in addition to uploading compliance documentation. The Clean Buildings Portal database will need ongoing improvement and functionality to improve the user experience.
- **Scale up no-cost technical assistance.** The Building Efficiency and Clean Operations Network (BEACON) Fellowship Project[8], launched in 2025, will further support building owners to overcome barriers to compliance with the Clean Building Performance Standard. At least 2,000 buildings are anticipated to be served by BEACON Fellows, with a focus on Tier 1 and Tier 2 commercial and multifamily building owners who lack the staff and resources to comply. Providing support to building owners from non-Commerce sources also empowers building owners to more freely engage with third parties to help navigate compliance.

Alternative compliance and GHG emissions

Updating the CBPS and the early adopter incentive programs will reduce GHG emissions.

- **Expand incentives to cover GHG emission reductions.** Recent rulemaking addressed alternative compliance pathways for compliance as directed in HB 1543, 2025. One of these pathways includes replacing existing fossil fuel-consuming space conditioning equipment with electric heat pump equipment. Aligning CBPS incentives to support GHG emissions reductions under this forthcoming compliance pathway is recommended. Consideration will be given to a GHG Intensity target when the standard is updated again in 2029.
- **Expand incentives to cover GHG emission reductions by coordinating with other programs.** Building owners suggested CBPS work with the Washington State Department of Ecology on its hydrofluorocarbons use restrictions and Refrigerant Management Program (RMP). Ecology's adopted rule restricts the use of HFCs and other fluorinated gases with a GWP more than 150 in refrigeration, air conditioning, and heat pump products and equipment. The RMP requires facilities with large refrigeration systems to inspect and report leaks, repair them quickly, and keep service records. It also requires practices to minimize refrigerant emissions. Since the CBPS targets the state's largest buildings, incentive programs could be targeted to support building owners who upgrade to equipment that emits fewer greenhouse gases by using less harmful refrigerants. Increasing

[8] Washington State Department of Commerce. Building Efficiency and Clean Operations Network (BEACON) Fellowship Project.

the scope of incentives to support buildings in complying with the Washington State Department of Ecology on its hydrofluorocarbons use restrictions[9] would reduce GHG emissions.

[9] Department of Ecology, State of Washington. Hydrocarbon use restrictions.

Appendix A: Tier 1 Early Adopter Incentive Program Applications

The applicants to the program estimate they will save over 219 million kBTUs of energy annually, which is as much power as 6,013 average American homes consume each year. Each applicant attests how much energy savings they will achieve by reducing electricity and natural gas consumption at the time of application. This chart lists the applications received by the programs and their estimated annual energy savings. Several projects have been completed and those resulting savings are included. Many projects exceeded their estimated savings with the project at Seattle Community College demonstrating energy savings at two times the estimated level. The actual measured savings are used to calculate the total savings of the projects of 219 million kBTUs of energy annually.

Building name	Predicted savings in kBtu annually
Seattle Community College	**5,021,534 (Actual measured savings 11,238,796)**
King County Library Service Center	**2,055,370 (Actual measured savings were 1,986,466)**
King County Library Bellevue	**2,166,488 (Actual measured savings were 1,934,425)**
Meydenbauer Center	**5,945,198**
Kittitas Valley Hospital	**3,043,019**
Snohomish County Jail	**7,152,009**
Overlake Hospital	**42,538,452 (Actual measured savings were 49,057,056)**
Deer Park Elementary School	**1,294,002 (Actual measured savings were 1,506,241)**
Whitworth University Robinson Hall	**1,125,960 (Actual measured savings were 4,410,891)**
Lakewood City Hall	**2,120,935**
Mill Creek Medical Office	**2,484,512**
UW Harborview Research	**6,995,299**
Providence Edmonds Hospital	**12,099,432**
Providence St. Mary's Hospital	**20,479,974**
Hilton Bellevue	**10,345,754**
Valley Athletic Club	**2,571,955 (Application withdrawn, estimated savings now 0)**
Providence Holy Family Hospital	**9,454,805**

Building name	Predicted savings in kBtu annually
Puget Sound Energy South King	**7,444,329**
Benton County Justice Center	**6,939,422**
Spokane County Justice Center	**10,156,544**
Clallam Bay Correctional Center	**22,734,726**
Bellevue Service Center	**3,327,699**
Everett Station	**4,387,094**
Canterbury Manor Multifamily	**533,500**
Mountlake Terrace High School	**13,422,372**
Total predicted savings in kBtu annually	***219,417,942***

Appendix B: Tier 1 Early Adopter Incentive Program Recipient Case Study

The Overlake Medical Center was an early applicant to the Tier 1 Early Adopter incentive program. The program awarded incentives of $2,209,883 to support building upgrades such as:

- Chilled water system
- HVAC controls upgrades
- Condenser water system improvements
- LED lighting upgrades
- Boiler control upgrades
- Insulation
- Pneumatic to DDC conversion
- Generator heat pump block heater

The project saved the hospital money on utility bills and will conserve energy for years to come with a predicted annual savings of 42,538,452 kBtu. The hospital and their energy contractor, UMC, produced a video[10] highlighting the 13% reduction in energy consumption in the building.

[10] UMC. Video: Overlake Medical Center's Path to Energy Efficiency. 2025.

Appendix C: Clean Buildings Performance Grants Program Case Study

The Pasco School District was an applicant to the Clean Buildings Performance Grants program. The program awarded $2 million in incentives to support school building upgrades, with $1 million dedicated to replacing the high school's HVAC system.

Pasco High School's aging HVAC system struggled to meet safety needs during the COVID-19 pandemic, running 24/7 to protect students and staff. In winter, classrooms relied on plug-in heaters, and by spring, indoor temperatures soared. With no space to relocate students, the school had few options until the Clean Building Performance Standards (CBPS) grant funding came through. The award is featured in this Commerce article: "Cooler classrooms ahead: Pasco's energy upgrades bring relief and opportunity to growing district. – Washington State Department of Commerce".

Appendix D: Energy Audits for Public Buildings Case Study

Commerce launched the Energy Audit Incentive Program, allocating an additional $14.5 million from the state budget to help public agencies, such as schools, cities and state offices, pay for building energy audits. The audits assess energy performance and identify opportunities for efficiency improvements.

These energy audits analyzed HVAC systems, water systems, building envelopes, and more to support compliance with the Clean Buildings Performance Standard. Highlights:

- Buildings in 19 counties received this funding.
- 52 buildings were audited in Spokane County.
- 36% of Tier 1 buildings in Kittitas County were audited.
- 218 public schools were audited.

More than 32 million square feet of Tier 1 building space was audited, as highlighted in our newsletter.

K-12 schools were the primary beneficiaries. Colleges and universities also received substantial support. For example, the program awarded $779,090 to Seattle College for energy audits. South Seattle College completed energy audits for Rainier Hall and the Robert Smith Building with grant funding. These initiatives aim to better serve student needs while helping Washington achieve its statewide climate goals and reduce greenhouse gas emissions. Commerce lauded this effort in a feature article: "A recipe for success: Culinary innovation at South Seattle College."