

Local Government / State Agency Energy Reporting Frequently Asked Questions

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as a Resource (SPEER)



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General Reporting Questions

What is Local Government and State Agency Energy Reporting?

The [Texas Health and Safety Code §388.005](#) requires political subdivisions, institutions of higher education, and state agencies in a non-attainment area or an affected county to

- establish a goal to reduce the entity's electricity consumption by at least 5 percent annually for 7 years, beginning Sept. 1, 2019; ([HSC §388.005\(c\)](#))
- report to the State Energy Conservation Office (SECO), on forms provided by that office, regarding the entity's goal, the entity's efforts to meet the goal, and progress the entity has made ([HSC §388.005\(e\)](#))

The "Local Government / State Agency Energy Report" is the form, developed by SECO, required to be submitted by affected political subdivisions to comply with [HSC §388.005\(e\)](#). The Local Government / State Agency Energy Report must be submitted to SECO by affected political subdivisions annually. The report is submitted online via the SECO website:

<https://comptroller.texas.gov/programs/seco/reporting/local-gov.php>.

Why does the State mandate Local Government / State Agency Energy Reporting?

The efficiency and reporting requirements established in [Texas Health and Safety Code §388.005](#) are part of the State's effort to reduce air pollution associated with the generation of electricity. 41 Texas counties are currently identified as "affected" by the Texas Emissions Reduction Plan ([30 TAC 114.629](#)). Political subdivisions in these counties are eligible to receive [TERP funding and resources](#) to support air quality improvement initiatives, and are subject to mandated efficiency and reporting requirements.

I've never heard of Local Government / State Agency Energy Reporting, is this a new requirement?

No, local government energy efficiency and reporting requirements were first established by the 77th legislature in 2001. Subsequent legislatures have updated, amended, and reauthorized the requirements since 2001. Most recently, the 86th Texas legislature (2019) reauthorized and extended local government efficiency and reporting requirements through 2026 with [Senate Bill 241](#).

Who is required to report?

The reporting requirements apply to each political subdivision, institution of higher education and state agency facility located in the 41 "affected counties" in Texas. A "political subdivision" is defined as "an affected county; or (B) any political subdivision in a nonattainment area or in an affected county other than: (i) a school district; or (ii) a district as defined by Section [36.001](#) or [49.001](#), Water Code, that had a total annual electricity expense of less than \$200,000 in the previous fiscal year of the district."

The 41 affected counties, as established by [Texas Administrative Code, Title 30, §114.629](#), are:

- | | |
|---------------|------------------|
| 1. Bastrop | 22. Hunt |
| 2. Bexar | 23. Jefferson |
| 3. Brazoria | 24. Johnson |
| 4. Caldwell | 25. Kaufman |
| 5. Chambers | 26. Liberty |
| 6. Collin | 27. Montgomery |
| 7. Comal | 28. Nueces |
| 8. Dallas | 29. Orange |
| 9. Denton | 30. Parker |
| 10. El Paso | 31. Rockwall |
| 11. Ellis | 32. Rusk |
| 12. Fort Bend | 33. San Patricio |
| 13. Galveston | 34. Smith |
| 14. Gregg | 35. Tarrant |
| 15. Guadalupe | 36. Travis |
| 16. Hardin | 37. Upshur |
| 17. Harris | 38. Waller |
| 18. Harrison | 39. Williamson |
| 19. Hays | 40. Wilson |
| 20. Henderson | 41. Wise |
| 21. Hood | |

[When is the report due?](#)

Local Government / State Agency Energy Reports are due February 1 of the following year. For example, the report of electricity consumption and efficiency in calendar year 2020 is the 2020 reports due February 1, 2021.

[What time period does the report cover?](#)

Reports should reflect the 12-month period of the preceding year. State agencies and institutions of higher education should report data on a fiscal year basis (September – August) and city and county governments should report data on a calendar year basis (January – December). Since billing cycles may not break “cleanly” across a calendar month, it is acceptable for consumption data to be based on utility billing months of the previous year.

[What is required to be reported?](#)

Sections 1, 2, 3, 6, 7, 9 and portions of Section 4 of the Local Government / State Agency Energy Report must be completed by all reporting entities. Section 5: Renewable Energy Data is optional.

Section 4 of the reporting form is broken down by electricity, natural gas and water consumption. Entities are only required to submit their **total annual electricity consumption** and are strongly encouraged to also isolate **electricity consumption and square footage of buildings**, as these numbers

are particularly important in calculating the overall air pollution reduction associated with Local Government / State Agency Reporting.

Entities also have the option to break down their electricity consumption further by traffic lights, streetlights, potable water facilities, wastewater treatment plants, electric vehicles (EVs), EV charging stations, and other end uses of electricity. The natural gas and water consumption portions are optional to report.

[My political subdivision is very small and consumes very little electricity. Do we have to report?](#)

Yes, there is no minimum size requirement in [Texas Health and Safety Code §388.005](#) and the statute applies to all political subdivisions in an affected county. Please report electricity consumption data for any and all end uses of electricity that the political subdivision pays for and controls.

As a small organization, you may have “completed all cost-effective measures to reduce electricity consumption, as determined by the parameters of [Local Government Code 302.004\(b\)](#)” in which case, you may qualify for an exemption from the 5% reduction in electricity consumption requirement.

To claim an exemption, your organization must:

1. Have submitted the local government energy report the previous calendar year; and
2. Have fallen short of the 5% reduction in electricity consumption relative to the previous calendar year; and
3. Completed an assessment within the last 12 months that all cost-effective measures to reduce electricity consumption have already been implemented. Cost-effectiveness should be determined according to the parameters of [Local Government Code 302.004\(b\)](#).

[What is the definition of “cost-effective measures to reduce electricity consumption”?](#)

[Texas Health and Safety Code §388.005\(b\)](#) states “Each political subdivision, institution of higher education, or state agency shall implement all energy efficiency measures that meet the standards established for a contract for energy conservation measures under Section [302.004\(b\)](#), Local Government Code, in order to reduce electricity consumption by the existing facilities of the entity.”

[Local Government Code §302.004](#) is understood to stipulate that energy conservation measures shall result in energy and water cost savings, achieved during the lesser of 20 years from the final date of installation or the average useful life of the energy conservation measures, that are equal to or greater than the cost of the energy conservation measure plus any financing costs. In other words, the energy conservation measure should pay for itself within its useful life or 20 years.

[Can I access my Local Government / State Agency Energy Reports from previous years?](#)

All Local Government / State Agency Energy Reports from 2019 will be emailed to the point of contact identified on the 2019 report prior to the end of calendar year 2020.

If you did not receive this email, or would like to access reports from years before 2019, please contact the following contacts (depending on your geographic region):

- **Collin, Dallas, Denton, Ellis, Hood, Hunt, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise counties:** North Central Texas Council of Governments, energy@nctcog.org
- **All other counties:** South-central Partnership for Energy Efficiency as a Resource, Cassidy Ellis, cities@eepartnership.org, 512-279-0765
- **All reporting political subdivisions statewide:** [SECO's Energy and Reporting Website](#), Fred Yebra, seco.reporting@cpa.texas.gov, 512-475-0753

[I have general questions or require additional assistance.](#)

Additional assistance for Local Government / State Agency Energy Reporting is available from SECO's community partners:

- **Collin, Dallas, Denton, Ellis, Hood, Hunt, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise counties:** North Central Texas Council of Governments, energy@nctcog.org
- **All other counties:** South-central Partnership for Energy Efficiency as a Resource, Cassidy Ellis, cities@eepartnership.org, 512-279-0765
- **All reporting political subdivisions statewide:** [SECO's Energy and Reporting Website](#), Fred Yebra, seco.reporting@cpa.texas.gov, 512-475-0753

Section 1: Reporting Entity Information

Who should be identified in the contact information?

That is up to the political subdivision. The point of contact should be a person who is responsible for coordinating annual Local Government / State Agency Energy Reporting. The point of contact may be staff of the political subdivision or a third-party representative identified by the political subdivision. The point of contact does not necessarily have to have direct familiarity with the political subdivision's electricity consumption or consumption reduction goals, but should be familiar enough with the requirements of [Texas Health and Safety Code §388.005](#) to coordinate data collection and reporting. Since reporting is done annually, best practices are for the reporting point of contact to be a permanent staff position (rather than a temporary employee) and to document entity reporting procedure to ensure reporting continuity and avoid confusion in the case of staff turnover.

Section 2: Reduction Goal

Does my political subdivision's electricity consumption reduction goal have to be formally adopted by its governing body?

[Texas Health and Safety Code §388.005](#), requires “each political subdivision, institution of higher education, or state agency shall establish a goal to reduce the electric consumption by the entity by at least five percent each state fiscal year for seven years, beginning September 1, 2019.” It is recommended that the goal is formally adopted through ordinance by the governing body of the reporting political subdivision. Official adoption helps ensure leadership and decision makers of the political subdivision provide support for electricity consumption reduction goals. However, unofficial or departmental goals are acceptable compliance options to meet the requirements of [Texas Health and Safety Code §388.005](#).

What if my political subdivision does not have an electricity consumption reduction goal in place?

Political subdivisions that have not established any official or unofficial goal to reduce electricity consumption by at least five percent each state fiscal year for seven years beginning September 1, 2019 should respond “No” to the question in Section 2 of the Local Government / State Agency Energy Report. The political subdivision should establish such a goal prior to the next annual Local Government / State Agency Energy Reporting deadline in order to comply with [Texas Health and Safety Code §388.005](#).

My political subdivision has established an electricity consumption reduction goal but did not achieve a 5 percent reduction from our previous year consumption. How do I respond to Section 2?

If a goal is established, respond “yes” to the question in Section 2 of the Local Government / State Agency Energy Report, regardless of total electricity consumption reduction achieved during the calendar year. Complete Section 9 of the form with details of the entity's goal, the entity's efforts to meet the goal, and progress the entity has made on achievement of a reduction goal.

Section 3: Calendar Year of Report

What period of time should the report cover?

As of 2020, Local Government and County reports should cover data from each calendar year. Reports should be submitted to reflect consumption from January – December of the preceding calendar year. Since billing cycles may not break “cleanly” across a calendar month, it is acceptable for consumption to be based on bills dated January – December of the previous calendar year.

State agencies and institutions of high education should continue to report data on the State fiscal year.

Section 4: Consumption Data

Required Electricity Consumption Reporting

What electricity consumption should be included in the reported consumption data?

Report any and all electricity consumption for which the subdivision pays the utility bill and controls the use of the electricity. The subdivision controls the use of electricity if it determines when the building is in use and can turn lighting, HVAC, or other systems on and off.

My political subdivision does not own our buildings and/or rents out some portions of our buildings to other entities. How do I report our electricity consumption?

Report all electricity for which the subdivision pays the utility bill and controls the use of the electricity. If the political subdivision rents or leases building space and pays the electricity bill, include electricity consumption for that space. If the subdivision leases space out to a tenant and the tenant pays the electricity bill, do not include electricity consumption for that leased out space. If the subdivision pays the bill on behalf of the tenant and charges the tenant back for utility costs, do not include electricity consumption for that leased out space.

My political subdivision owns facilities in multiple counties; some are on the affected county list and others are not. What do I report?

If your facilities are located in multiple counties only report electricity and other consumption data and efficiency efforts for the facilities within the 41 affected counties.

What electricity end-uses should I include in each category?

Buildings

- All electricity consumption associated with the operation and supporting functions of buildings or portions of buildings.
- Site and parking lot lighting associated with a building meter
- Sport and park lighting associated with a building meter
- Consumption from electric vehicle charging stations that cannot be isolated from building meter

Traffic Lights

- Report electricity consumption for traffic lights owned only by the political subdivision

Street Lights

- Report electricity consumption for streetlights owned only by the political subdivision. If streetlights are utility-owned, do not include in report.

Potable Water Facilities

- Report all electricity consumption associated with pumping and treating water for potable water supplies that is owned and/or controlled by the reporting political subdivision. Electricity consumed in office or support buildings at potable water facilities should be included in the building's consumption total.

Wastewater Treatment Plants

- Report electricity consumption associated with pumping and treating wastewater that is owned and/or controlled by the reporting subdivision. Electricity consumed in office or support buildings at potable water facilities should be included in the building's consumption total.

Electric Vehicles (EVs)

- The form does not require reporting of electricity consumed by battery-electric and plug-in hybrid electric vehicles, only numbers of vehicles owned by the political subdivision.

EV Charging Stations

- Report electricity consumed by electric vehicle charging stations that is paid for by the political subdivision and is sub-metered or on a separate meter from a building meter.

Other

- Airport runway lighting
- Electricity consumed by renters of camping and RV sites owned/operated by political subdivision
- Sport and park lighting not associated with a building meter

Note: The electricity consumption for all non-building end-use categories should be combined with total buildings consumption and entered in total electricity consumption kWh.

[What if my political subdivision is not able to break out electricity use by end use for buildings, traffic lights, streetlights, potable water facilities, wastewater treatment plants, electric vehicles, or electric vehicle charging stations?](#)

It's ok! Every political subdivision is different and utilities are set up and billed in many different ways. Focus on determining the **total electricity consumption** as well as isolating **electricity consumption and square footage of buildings**, as these numbers are particularly important in calculating the overall air pollution reduction associated with Local Government / State Agency Reporting. If other end uses of electricity are not able to be determined or isolated, combine the electricity consumption for all non-building end-use categories and the buildings kWh consumption and enter the sum in total electricity consumption (kWh). Provide a narrative explanation of circumstances in Section 8 of the report.

Where can I find my electricity consumption data?

The source of electricity consumption data depends your location in Texas and the provider of your utilities. There are many ways to access annual energy consumption information without manually consolidating data from utility bills. Calling the customer service number on your electricity bill might be your best first step. Below are possible sources for utility data.

Smart Meter Texas

Smart Meter Texas is a web portal that provides users access to their daily, monthly, and 15-minute interval data recorded by smart meters in competitive retail areas of Texas. These areas include regions served by AEP Texas Central Company, AEP Texas North Company, CenterPoint Energy Houston Electric, LLC, Oncor Electric Delivery Company LLC, or Texas-New Mexico Power Company. [See map of regions served by these utilities.](#)

Retail Energy Providers (REPs)

Your retail energy provider (REP) should be able to provide you with your electricity consumption data for any accounts served by that provider. Many REPs also have web-based portals to access utility data. There are hundreds of REPs operating in Texas, contacting the customer service identified on your electric bill is a good first step to accessing energy data from your REP.

Transmission and Distribution Utilities (TDUs)

In addition to Smart Meter Texas some TDUs in competitive retail areas of Texas operate their own web portals to access utility data online.

- CenterPoint Energy - Energy Data Portal:
<https://energydataportal.centerpointenergy.com/>
- Texas-New Mexico Power Company – Electric Usage Data Viewer:
<https://www.tnmp.com/customers/data-viewer>

Other utilities operating in Texas

Much of the state is served by municipally owned utilities, electric cooperatives, or other non-competitive utilities. Similar to competitive retail areas, these utilities are a good source of electricity consumption data. Contacting the customer service number on your utility bill, or checking your provider's website for an online data portal is a good first step to accessing your utility data.

Third Party Service Providers and Energy Services Companies (ESCOs)

If your public subdivision engages a third party to assist with electricity supply contracts, energy efficiency improvements, load management, or other energy-related services, those service providers may be able to assist with Local Government / State Agency Energy Reporting. Contact your service provider to find out if they have services available to assist with data collection and reporting. Some companies may help consolidate energy data for reporting free of charge.

Optional Natural Gas and Water Consumption Reporting

Why is optional reporting of natural gas and water included in the Local Government / State Agency Energy Report?

Tracking and analyzing natural gas and water consumption data gives a political subdivision a more complete picture of energy consumption and efficiency opportunities. If a political subdivision wants to compare energy consumption across facilities, it is important to account for all energy consumption, not only electricity. The Local Government / State Agency Energy Reporting form offers an optional field to report natural gas and water consumption as an annual record of gas and water efficiency efforts.

Section 5: Renewable Energy Data (Optional)

Why is optional reporting of renewable energy data included in the Local Government / State Agency Energy Report?

Political subdivisions are increasingly installing renewable energy generation (solar photovoltaic, wind turbines, biomass, and geothermal) on facilities or purchasing renewable energy through their utility providers or a third party. While the [Texas Health and Safety Code §388.005](#) only mandates a reduction of electricity consumption, renewable energy can be an important strategy to reduce a political subdivision's air quality impact. The Local Government / State Agency Energy Reporting form offers an optional field to report renewable energy data as an annual record of these efforts.

My political subdivision purchases renewable energy credits (RECs) or Carbon Offsets, should I include these in my reporting?

The renewable energy data reported should only include renewable energy purchases that result in additional generation added to the energy system. If your political subdivision's RECs or carbon offsets are associated with the addition of new generation, they should be included in the report.

What sources of renewable energy should I include?

Only report renewable energy generation owned by the political subdivision or purchased by the political subdivision directly. Although the electricity provided by the grid is partially generated by renewable energy sources, the report is looking for renewable energy generated in addition to the existing generation provided by the grid.

Section 6: Use and Interest in SECO Assistance Resources

Where can I find more information about SECO assistance programs?

More information and applications are available on the SECO website

(<https://comptroller.texas.gov/programs/seco/programs/local/>). Program specific links and information below:

- Preliminary Energy Assessments:
 - o Free on-site assessments of energy and water efficiency opportunities for public buildings
 - o <https://comptroller.texas.gov/programs/seco/programs/local/pea.php>
- Technical Assistance for Local Governments:
 - o Free customized, on-site, energy-related services across a broad spectrum, ranging from basic consultation to feasibility studies
 - o <https://comptroller.texas.gov/programs/seco/programs/local/tech-assistance.php>
- City Efficiency Leadership Council:
 - o Education and one-on-one support of local governments about energy and water efficiency topics and projects
 - o https://eepartnership.org/city-efficiency-leadership-council_2020/
- LoanSTAR Revolving Loan Fund:
 - o Low interest financing for energy and water efficiency improvements for public facilities
 - o <https://comptroller.texas.gov/programs/seco/funding/loanstar/>

I have participated in a SECO assistance program in the past. Can I use the resources again?

There is not a limit to participation in Preliminary Energy Assessments, Technical Assistance, or the City Efficiency Leadership Council. LoanSTAR loans are capped at three applications per year per entity for a total loan size of \$8 Million each loan (\$24 Million total).

Section 7: Areas of Improvement & Resources

What are the areas of improvement and Resources listed in Section 7?

- HVAC Equipment:
Upgrades to air conditioning, heating, or ventilation equipment including chillers, rooftop units, fans, pumps, ducts, or other component to improve energy consumption and efficiency.
- Sensors/Controls:
Installation of sensors or controls to optimize function of HVAC, lighting, or other energy using system.
- Building Energy Management System (EMS) or other automation:
Installation of automated system to manage and optimize function of whole building energy using systems.
- Plug Load (appliances, computers, etc.):
Use of energy efficient equipment (such as ENERGY STAR rated computers and appliances) and controls to reduce electricity use of plug-in devices.
- Indoor Lighting:
Replacement of interior lighting lamps and fixtures to energy efficient LED lighting.
- Outdoor Lighting:
Replacement of exterior lighting lamps and fixtures to energy efficient LED lighting (not including street or traffic lighting).
- Streetlighting:
Replacement of street light lamps and fixtures to energy efficiency LED lighting.
- Water Heating/Boiler:
Replacement of water heating systems (either gas or electric) to more energy efficiency equipment.
- Building Envelope - Glazing:
Replacement, repair, or sealing of building windows
- Building Envelope - Window Film:
Installation of after-market film on building windows to improve thermal performance.
- Building Envelope - Insulation/Radiant Barrier:
Repair, replacement, or installation of insulating in the building envelope to improve thermal performance of walls, roof, or floor.
- Building Envelope – Cool Roof:
Installation of roofing material designed to reflect more sunlight and absorb less heat than a standard roof.
- Water/Wastewater – Pumps:
Installation of water conveyance pumps with higher efficiency pumps
- Water/Wastewater – Leaks:
Identification and repair of leaks in water supply and wastewater systems to reduce water loss and waste.
- Combined Heat and Power or Other Co-Generation:

Construction of a facility that concurrently produces electricity or mechanical power and useful thermal energy (heating and/or cooling) from a single source of energy. Cogeneration is often located at or near the point of consumption.

- New Construction or Other Renovation:
Construction of new buildings or facilities. New facilities are generally more energy efficient than older buildings.
- Energy Storage:
Installation of thermal or battery storage facilities for energy resilience, to facilitate energy generation from renewable energy sources or generated off peak hours.
- On-Site Renewable Energy Generation:
Installation of solar photovoltaic panels, wind turbines, biomass, or geothermal systems on land owned or operated by the political subdivision located on or near the site of the building consuming the energy.
- Off-Site Renewable Energy Contract or Renewable Energy Credits (RECs):
Purchase of energy generated by renewable energy generation sources not located in proximity to the building consuming the energy.
- Benchmarking:
Comparing the energy performance of facilities to each other, peers and competitors, and over time to prioritize which facilities to focus on for improvements.
- Utility Data Tracking:
Consolidating energy and water consumption and cost information into a centralized spreadsheet, database, or software to evaluate data for energy and water savings opportunities.
- Energy Policy/Plan/Program Development:
An energy policy, plan, or program may include formal adoption of energy management best practices and goals through resolution or ordinance, or internal departmental standard operating procedures. The intent is a consolidated and intentional initiative to reduce energy waste through behavior changes and use of energy efficient equipment and technology.
- Water Conservation Policy/Program Development:
A water conservation policy, plan, or program may include formal adoption of water management best practices and goals through resolution or ordinance, or internal departmental standard operating procedures. The intent is a consolidated and intentional initiative to reduce water waste through behavior changes and use of water conserving equipment and technology.
- Operation/Maintenance Training:
Providing building operators and facility managers access to supplemental training to establish and reinforce energy and water saving best practices. Examples include [Building Operator Certification](#), manufacturer training, trade or technical schools, or training offered by the Department of Energy.
- Conservation Behavior Training
Providing training or other encouragement to building occupants to reduce energy and water consumption through behavior change such as turning off lights, powering down computers, avoiding use of plug-in heaters, etc.

Section 8: Additional Feedback

My political subdivision has a special circumstance. Where can I explain my special circumstances?

Section 8 of the Local Government / State Agency Energy Report is designed to capture any detail or explanation not captured elsewhere in the form. This includes explanation of special circumstances, details on how end uses were accounted for in Section 4, further description of any energy or water management initiatives of the political subdivision. Since a record of the Local Government / State Agency Energy Report will be emailed to each reporting political subdivision ahead of future year reporting deadlines, Section 8 can also be a helpful place to store notes for future reporting years.

Section 9: Progress Toward Goal

My political subdivision has filed for an exemption in the past, do I have to report?

Yes. Since the Local Government / State Agency Energy Reporting requirements of [Texas Health and Safety Code §388.005](#) were reauthorized by [Senate Bill 241](#) by the 86th Legislature, 2019 electricity consumption is the new baseline for reporting. Therefore, prior exemptions are no longer active and must be reestablished.

A political subdivision may apply for a new exemption on the 2021 Local Government / State Agency Energy Report or on subsequent annual reports if all exemption qualification criteria have been met. See exemption qualifications below.

Do I qualify for an exemption?

To claim an exemption, your organization must:

1. Have submitted the local government energy report the previous calendar year; and
2. Have fallen short of the 5% reduction in electricity consumption relative to the previous calendar year; and
3. Completed an assessment within the last 12 months that all cost-effective measures to reduce electricity consumption have already been implemented. Cost-effectiveness should be determined according to the parameters of [Local Government Code 302.004\(b\)](#).

How does my political subdivision request an exemption?

Your political subdivision may request an exemption if it has 1) submitted the Local Government / State Agency Energy Report the previous calendar year; and 2) fallen short of the 5% reduction in electricity consumption relative to the previous baseline year; and 3) completed an assessment within the last 12 months that documents all cost-effective measures to reduce electricity consumption have already been implemented.

If requesting an exemption, check the box in Section 9 of the form, verifying that all exemption requirements have been met and submit additional documentation to serve as justification for this exemption request in the upload box of the Local Government / State Agency Energy Report.

What is the definition of “cost-effective measures to reduce electricity consumption”?

[Texas Health and Safety Code §388.005\(b\)](#) states “Each political subdivision, institution of higher education, or state agency shall implement all energy efficiency measures that meet the standards established for a contract for energy conservation measures under Section [302.004\(b\)](#), Local Government Code, in order to reduce electricity consumption by the existing facilities of the entity.”

[Local Government Code §302.004](#) is understood to stipulate that energy conservation measures shall result in energy and water cost savings, achieved during the lesser of 20 years from the final date of

installation or the average useful life of the energy conservation measures, that are equal to or greater than the cost of the energy conservation measure plus any financing costs. In other words, the energy conservation measure should pay for itself within its useful life or 20 years.