



# BEUDO APPLICATION GUIDE: Hardship Compliance Plan

**CITY OF  
CAMBRIDGE**  
Office of  
Sustainability

## Instructions to prepare and submit a BEUDO Hardship Compliance Plan

If you are an Owner of a Covered Property under the Building Energy Use Disclosure Ordinance (BEUDO) seeking temporary relief from requirements, this document walks you through how to confirm your eligibility, prepare an application, and submit a Hardship Compliance Plan.

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### Overview

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Hardship Compliance Plans offer pathways to comply with BEUDO that reflect the real conditions or limitations of a property, such as financial distress. They are available if BEUDO’s requirement for a Covered Property to reduce emissions would result in a qualifying hardship.

Hardship Compliance Plans are reviewed by the BEUDO Review Board. If approved, as long as you adhere to your Hardship Compliance Plan, you will not be subject to penalties for not complying with the standard emission reduction schedule.

## STEP 1: Is a Hardship Compliance Plan right for me? Determining Eligibility

The Owner of a Covered Property is eligible to apply for a Hardship Compliance Plan that modifies emission reduction requirements if the following conditions are met:

- A. The Covered Property is up to date on other BEUDO requirements (Sections 8.67.040 and/or 8.67.050), including submission of required forms and reporting energy data for the most recent compliance year.
- B. The Covered Property will not be on track to meet standard targets in Section 8.67.100.
- C. The Owner or Covered Property faces a qualifying hardship.

### A. Are you up to date on BEUDO requirements?

We need to know what your requirements are in order to determine whether you need changes. Your emission reduction requirements are based on two pieces of information: your property's configuration and your baseline.

#### How to submit forms?

This [checklist](#) walks you through submission of these two forms in the [BEAM Owner Portal](#).

### Required for all: Submit Property Configuration Form

You must submit a [Property Configuration form](#) to the City in order to proceed with a Hardship Compliance Plan. The Technical Guide for [Covered Properties and Building Configuration](#) helps you confirm your requirements based on the size of your building(s) and presents your options to report multiple buildings on a parcel together.

### Optional: Establish your Baseline in BEAM

If you would like to use an Alternative Baseline, which changes the starting point of your emissions reduction timeline, complete the [Baseline Selection Form](#). The Technical Guide: [Establishing Your Baseline](#) helps you understand the impact that this decision may have on your emission reduction requirements.

If you do not select a baseline, the City will apply the default baseline years averaged from 2018 and 2019 to your Covered Property.

### Required for all: Submit annual energy data

Until now, the primary requirement for your Covered Property has been to report annual energy data, called benchmarking. Even if emissions reductions have not been achievable, you will need to continue reporting energy data each year.

Through May 2026, being up to date means that, in addition to the forms, you have submitted complete energy data for calendar year 2024.

After May 2026, you should have submitted your 2025 data.

## B. So, are you on track for BEUDO compliance?

Once the forms are submitted and reviewed, you will have access through the [BEAM Owner Portal](#) to two important pieces of information: 1) your Covered Property ID for your configured property and 2) your Covered Property's Maximum Allowable Emissions for Compliance Period 1 (2026-2029). This is your 2026 emissions limit, reported in metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>). For large buildings above 100,000 covered square feet, the 2026 limit is 80% of your baseline. In other words, you need to reduce total emissions by 20%.

While you will not know your Covered Property's actual 2026 emissions until the end of the year, you can get a sense of whether you are on track or not by referring to previously submitted data from prior years.

Covered Properties with data in a single Energy Star Portfolio Manager Account may use this [Emissions Calculator and Credit Estimation Tool](#) in the [BEAM Owner Portal](#) for a preliminary estimate of whether you are on track, based on your 2024 data.

## Understand your options for compliance

If your Covered Property's emissions are expected to be above the limit, first consider how existing options can help. To pursue a Hardship Compliance Plan, you will first need to address how you have evaluated these options.

1. Purchase qualifying renewable energy to reduce your electricity emissions. This [Emissions Calculator and Credit Estimation Tool](#) shows the extent to which RECs can help you meet your target for Compliance Period 1. *Note: If your emissions that come from electricity use are at least 20 percent of your total emissions, you may be able to enter into compliance just by purchasing Renewable Energy Certificates (RECs) that meet the BEUDO criteria.*
2. Purchase Alternative Compliance Credits, priced at \$234 per ton of emissions.
3. Starting in 2029, there will be an option to purchase Verified Carbon Credits.

## C. Did you or your Covered Property face a Qualifying Hardship?

If one or more of the qualifying criteria below apply to your Covered Property during the applicable Compliance Period, you are eligible to apply for a Hardship Compliance Plan.

Applicants should identify all criteria that apply and be prepared to submit supporting documentation demonstrating eligibility through the BEAM Owner Portal, with explicit references to relevant clauses or sections of any attachments (e.g., lease clause).

Hardship eligibility criteria include:

- ▶ **Financial Distress:** bankruptcy, insufficient funds, or denied/delayed approvals for incentive programs.
- ▶ **Ownership Structure Consisting of Individual Non-Residential Condominiums:** If there are two or more owners of buildings on the Covered Property, and this structure limits completion of compliance work.
- ▶ **Regulatory or Contractual Designation:** Related to challenges with renewable energy contracts, tenants, interconnection, permitting, and/or equipment or safety standards affecting energy use
- ▶ **Technical or Operational:** Physical space constraints, manufacturing process loads, and historical property constraints.
- ▶ **Other circumstances or characteristics:** Including natural disasters, commitment to your own net zero energy plan, or another scenario, all at the discretion of the BEUDO Review Board.

Table 1 on the following page describes the conditions and circumstances that make a Covered Property eligible to develop a Hardship Compliance Plan, and identifies the required submittal materials. The Review Board will determine whether there is sufficient support for your case. Explanations of each of the components of a plan, and Table 1, are as follows:

<b>Qualifying Criteria</b>	What is your hardship? Choose one criterion for your application, or more if relevant.
<b>Relief Type</b>	Identifies the most appropriate relief type for each qualifying criterion. Do you need a different timeline? Do you wish to exempt a particularly intensive energy load from a manufacturing process? Do you just need to make an administrative change?  You may propose an alternative compliance mechanism or request a different type of relief, which will be reviewed by the Review Board and approved at its discretion.

<p><b>Required Submittals</b></p>	<p><b>Narrative:</b> All applications must explain how and why the qualifying hardship applies to your Covered Property’s circumstance, and how the relief will help you.</p> <p><b>Brief narrative of additional compliance measures:</b> Where required, plans should address how the Owner has used, planned to use, and/or considered the use of additional compliance measures prior to applying for a Hardship Compliance Plan, including Alternative Compliance Credits, Renewable Electricity Certificates, Verified Carbon Credits (starting in 2029), and reporting as a campus.</p> <p><b>GHG Emissions Schedule:</b> <a href="#">This Excel spreadsheet</a> is where you will propose a new timeline for emissions reduction. If approved, this schedule will replace your Covered Property’s annual GHG emissions reduction targets in 8.67.100.</p>
<p><b>Criteria Documentation</b></p>	<p>To support the claim of the qualifying criteria, demonstrate evidence for review by the Review Board. In the event that documentation types below are not available, the Owner may submit equivalent materials with an explanation for why the required documentation could not be furnished.</p>
<p><b>Applicable Plan Type &amp; Energy Audit</b></p>	<p>The level of detail of the energy audit is based on plan type. The audit type is not limited to the tools identified, but should meet the equivalent scope and intent (see <b>Appendix A: Energy Audit Options</b>).</p> <p>Utility scoping studies and/or building assessments are encouraged when project is being planned for implementation.</p> <p>Campuses: In lieu of an energy audit for each Covered Property comprising the Campus, the Owner may provide relevant Campus-wide documentation.</p>

**TABLE 1. APPLICATION REQUIREMENTS BY QUALIFYING CRITERIA**

Qualifying Criteria	Relief Type	Required Submittals	Criteria Documentation	Minimum Level of Energy Audit by Plan Type
<b>Financial</b>				
(a) Bankruptcy: Owner declared bankruptcy during all or part of a Compliance Year	Alternative Schedule	Narrative + scope	Bankruptcy court filings	Short or Long-Term: DOE BETTER + Asset Score, or Labs2Zero for labs
(b) Lack of capital: Cost of compliance exceeds funds the Owner can reasonably access or raise		Brief narrative of additional compliance measures	Financial statements, capital reserve analysis, lender letters	Short-Term: DOE BETTER + Asset Score, or Labs2Zero for labs
(c) Incentive Delays: Denial or material delays in utility/decarbonization incentive programs		GHG Emissions Schedule	Denial letters or status logs from utility/government programs	Long-Term (5+ yrs): ASHRAE Level 2, DOE MEASUR
<b>Ownership</b>				
(a) Individual Ownership of Non-Residential Condos: Multiple owners with separate units creating work/allocation constraints	Alternative Property Configuration	Narrative + scope  GHG Emissions Schedule	Deeds or ordinances showing ownership constraints	Administrative Modification: EnergyStar Portfolio Manager

Qualifying Criteria	Relief Type	Required Submittals	Criteria Documentation	Minimum Level of Energy Audit by Plan Type
<b>Regulatory / Contractual</b>				
(a) Energy Contracts: Long-term contracts without reopeners for significant energy demand	Alternative Schedule	Narrative + scope  Brief narrative of additional compliance measures  GHG Emissions Schedule	Signed energy supply contracts	Short-Term: DOE BETTER + DOE Asset Score, or Labs2Zero for labs  Long-Term: ASHRAE Level 2, DOE MEASUR
(b) Pre-existing Leases: Lease signed prior to 6/26/23 prohibits work; tenant is uncooperative			Lease agreement; proof tenant is unwilling to cooperate	
(c) Renewable Energy Delays: Delays in renewable credits under an executed Power Purchase Agreement			Power Purchase Agreement; official delay notice identifying cause and schedule; Owner's timeline for remedy	
(d) Grid/Permit Delays: Interconnection delays or government permit denials			Interconnection correspondence, permit logs, and/or agency responses	
(e) Conflicting Standards: Meeting other regulatory, accreditation, or certification requirements	Alternative Schedule <i>and/or</i> Energy Exemption	Evidence of conflicting regulations or standards		

Qualifying Criteria	Relief Type	Required Submittals	Criteria Documentation	Minimum Level of Energy Audit by Plan Type
<b>Technical / Operational</b>				
(a) Space Constraints: Physical building or parcel constraints prevent compliance work	Alternative Schedule	Narrative + scope  Brief narrative of additional compliance measures  GHG Emissions Schedule	Engineering studies and site/floor plans	Short-Term: DOE BETTER + DOE Asset Score, or Labs2Zero for labs  Long-Term: ASHRAE Level 2, DOE MEASUR
(b) Manufacturing Loads: Hardship arises specifically from reducing manufacturing process load emissions	Alternative Schedule <i>and/or</i> Energy Exemption		Process load and energy use analysis	
(c) Historical Status: Property is a designated Historical Property under IECC 2021	Alternative Schedule		Historic designation records (IECC 2021)	
(d) Baseline Vacancy: Unoccupied or not fully operational during default baseline years	Baseline after 2019		Occupancy records, utility data, or lease-up schedules	

Qualifying Criteria	Relief Type	Required Submittals	Criteria Documentation	Minimum Level of Energy Audit by Plan Type
<b>Other</b>				
(a) Delays due to natural disaster or state of emergency	Alternative Schedule		Disaster declarations, insurance claims, or contractor delays	Short-Term: DOE BETTER + DOE Asset Score, or Labs2Zero for labs  Long-Term (5+ yrs): ASHRAE Level 2, or DOE MEASUR
(b) The Owner has adopted a long-term, comprehensive decarbonization strategy for their Covered Property or Campus with annual emissions targets that demonstrate alignment with the greenhouse gas emissions reductions in BEUDO.	Alternative Schedule	Narrative + scope  Brief narrative of additional compliance measures  GHG Emissions Schedule	Capital plan, net zero energy plan, roadmap, or other officially adopted decarbonization strategy committing to emissions targets in Covered Properties or Campus aligned with BEUDO  Narrative justification of reasonable divergence from, and demonstrable progress toward, the standard GHG emission reduction schedule	
(c) Other circumstances	To be determined		Justification deemed sufficient by the Board	

## STEP 2: Determine Type of Hardship Compliance Plan

Owners may apply for one of the following three types of plans to address circumstances affecting a Covered Property's ability to comply with emission reduction requirements.

### Tier I: Administrative Modification

<b>Applicability</b>	Designed for operational circumstances and issues requiring a one-time administrative adjustment. Requires minimal or standard documentation.
<b>Qualifying Criteria</b>	<p><b>Baseline Adjustment:</b> Allowance of an Alternative Baseline (two consecutive years after 2018) not permitted under § 8.67.100, due to prolonged vacancy or occupancy changes involving significantly different energy use intensity (without a formal Change of Use). In other words, you can pick a baseline after 2019. Granted no more than once per property.</p> <p><i>And/or</i></p> <p><b>Covered Property Configuration Adjustment:</b> Allowance for nonresidential condominium buildings needing to report units as individual Covered Properties.</p>
<b>Energy Audit Type</b>	At minimum, export a PDF of your Energy Star Portfolio Manager dashboard showing your ESPM score. See Appendix A for more options.
<b>Deadline</b>	Must be submitted by <b>October 1</b> to be used beginning in that same year. For plans beginning in 2026, the deadline is December 1, 2026.
<b>Application</b>	Submit through BEAM Owner Portal through <a href="#">this form</a> <a href="#">MS Word Application Template</a>

### Tier II: Short-Term Alternative Compliance Plan

<b>Applicability</b>	Applies where documented barriers (e.g., awaiting permits, funding/incentives under review, or interconnection timelines) impact your ability to comply on time.
<b>Duration</b>	Temporary relief for a period of <b>up to 5 years</b> .
<b>Qualifying Criteria</b>	Any qualifying criteria except for those relevant to an Administrative Modification.
<b>Energy Audit Type</b>	At minimum, link your Energy Star Portfolio Manager data to DOE BETTER tool and complete the Asset Score. See Appendix A for more options.
<b>Deadline</b>	Must be submitted by <b>October 1</b> to be used beginning in that same year. For plans beginning 2026, the deadline is December 1, 2026.
<b>Application</b>	Submit through BEAM Owner Portal through <a href="#">this form</a> <a href="#">MS Word Application Template</a>

**Emergency Exception:** Owners may apply for a Short-Term Plan after the October deadline but before December 31 if they experience unforeseeable events outside their control. The application must include evidence of the underlying event and why it necessitates a plan.

### Tier III: Long-Term Alternative Compliance Plan

<b>Applicability</b>	In cases where substantial financial, operational, technical, or structural barriers make standard compliance pathways infeasible, requiring a comprehensive restructuring of compliance obligations. A Covered Property or Campus with their own long-term decarbonization strategy may also choose to apply for a Long-Term Alternative Compliance Plan
<b>Duration</b>	Relief greater than 5 years.
<b>Qualifying Criteria</b>	Any qualifying criteria except for those relevant to an Administrative Modification.
<b>Energy Audit Type</b>	Unless applying as a campus, a long-term plan requires an ASHRAE Level 2 audit or equivalent. See Appendix A for options.
<b>Deadline</b>	Must be submitted by <b>July 1</b> for the plan to be used beginning in that same year. For plans beginning in 2026, the deadline is October 1, 2026
<b>Application</b>	Submit through BEAM Owner Portal through <a href="#">this form</a> <a href="#">MS Word Application Template</a>

## STEP 3: Prepare Your Application

### A. Do you want direct assistance before you start an application?

If you are interested in applying for a Hardship Compliance Plan but need more assistance to understand how to proceed, submit [this Plan Assistance form](#) and City staff will reach out with resources and an invitation for you to attend Office Hours with City staff.

Please read through this guidance first, review the templates, and come prepared with your questions.

### B. Application Contents

While you may use your own format if you wish, fillable MS Word templates are available for you to download. These templates include prompts for what to include in the narratives.

- [Template for Administrative Modification](#)
- [Template for Short- or Long-Term Alternative Compliance Plan](#)

The application package includes the following:

Section	Instructions
Title page	Title page for your application packet.

Application Summary	One-page summary of the major components of the proposed application, for the Review Board’s quick reference
Application Body	Invites narrative, more detailed explanations for each component of your plan
Covered Property or Campus Owner’s signature	Signature form for the Owner or authorized representative
File attachments	Documentation is to be submitted through BEAM. This includes the Energy Audit, Criteria Documentation, and, where relevant, the GHG Emissions Schedule

### C. Application Body

#### Covered Property Information

- Identify your Covered Property or Campus by including the prompted details visible through your [BEAM Owner Portal](#).
  - ID numbers, address, and baseline years
  - Emissions Data: You must provide the total emissions from the prior compliance year and your maximum allowable emissions for Compliance Period 1 (kgCO2e/yr).
  - Property Specs: Include the total covered square feet (csf) and the year the building was built (or the date of the newest Certificate of Operation).

#### Compliance Attestation

- Before proceeding, you must attest that the property is in compliance with BEUDO benchmarking (i.e., reporting) requirements (Section 8.67.040 and/or 8.67.050) for the most recent compliance year. Include the specific prior compliance year to complete this section.

#### Qualifying Hardship Criteria

- The Review Board needs a detailed narrative and physical proof of your hardship.
- Choose your qualifying hardship criteria from the dropdown list. You must upload supporting documentation to BEAM for each criterion selected.
  - Nomenclature: Use the format [CoveredPropertyID\_Category of Hardship\_Title of Document].
  - Description: Provide a one-sentence summary of the file contents for each upload. If there’s a specific relevant section, call out the page number and/or section.
- Existence and Scope: Explain in detail how and why the selected criteria present an obstacle to compliance. If identifying multiple hardships, provide a unique narrative for each. If applicable, describe any decarbonization efforts to date, such as outreach with utilities, tenants, or service

providers. Detail any on-site emissions reduction work already completed on heating or cooling systems.

## Evaluation of Flexibility Measures and Compliance Mechanisms

The Review Board needs to know that you have made a "good faith" effort to comply using existing flexibility measures before seeking a hardship exception. BEUDO already allows for the purchase of Renewable Energy Certificates (RECs) and other "off-site" options, and flexibility mechanisms such as choosing different baseline years as your starting point.

Provide a concise narrative below detailing how you have implemented, planned for, or evaluated the feasibility of each of the flexibility measures listed below. For any measures deemed inapplicable or non-feasible, state the specific constraints that precluded their use. Use [this tool](#) in BEAM to see how you may be able to meet your needs through renewable electricity certificates.

1. **Qualifying Renewable Energy Certificates.** Describe any efforts made to acquire RECs to offset electric emissions. If RECs have not been pursued or were found to be an unviable solution, explain the reasoning behind that determination. Use the [Emissions Calculator and Credit Estimation Tool](#) to see if you might be able to purchase RECs to help meet your target.
2. **Alternative Compliance Credits.** For a single Covered Property, use the [Emissions Calculator and Credit Estimation Tool](#) to estimate the projected cost of compliance via ACCs. Provide these estimates and explain how this financial obligation impacts the property's compliance strategy or overall viability.
3. **Verified Carbon Credits (VCCs):** Note that VCCs will become available in 2030 for application toward thermal emissions. If your alternative compliance plan extends past 2030, describe how you have integrated (or why you have excluded) the anticipated use of these credits in your long-term strategy.

The following are more structural considerations that may not apply to your Covered Property or Campus.

4. **Campuses.**
  - a. If your portfolio does not meet the eligibility threshold (e.g., the owner does not hold 5 or more CPs), enter N/A and proceed to the next section.
  - b. For those eligible to report as a Campus, provide context for your chosen approach:
    - i. Individual Reporting Rationale: If you were eligible to form a Campus but elected to report properties individually, briefly explain the strategic or operational decision behind this choice.
    - ii. Campus Reporting: If this application is submitted as a Campus, provide a narrative explaining the extent to which reporting emissions in the aggregate provided a

more viable route for meeting the emission reduction trajectories of your Covered Properties.

5. **Alternative Configuration.** Review the [Technical Guide: Covered Property Configuration](#) and confirm that your selected configuration is most advantageous for your goals.
  - a. If your Covered Property (CP) consists of a single building on a single parcel, enter N/A and proceed to the next section.
  - b. If the Covered Property contains multiple buildings but an Alternative Configuration was not used, provide the reasoning behind this decision (e.g., existing metering structures).
  - c. If you are currently using an Alternative Configuration, explain the limitations of this mechanism. Detail why this configuration alone is insufficient to facilitate full compliance with the current emission standards.
6. **Alternative Baseline:** The selection of a baseline year sets the foundation for your reduction trajectory. Provide context for the baseline used for your Covered Property. If needed, review the [Technical Guide: Establishing your Baseline](#).
  - a. If you selected to use the Default Baseline, explain the decision-making process. Factors may include a lack of verifiable historical data for alternative years or a determination that the default baseline provided the most favorable or accurate starting point.
  - b. If you selected to use an Alternative Baseline, describe how this adjustment assisted in your compliance efforts and why, while helpful, the alternative baseline does not fully resolve the challenges in meeting the mandated reduction targets.

## Relief Request

Specify exactly which regulatory requirement you are asking the City to modify. You may request one or more of the following:

- **Alternative Emissions Schedule:** Propose a custom timeline via the [GHG Emissions Schedule](#).
- **Exemption of Energy Source:** Requesting specific fuels be excluded from calculations due to technical necessity.
- **Administrative Modification: Modification of Configuration:** Adjusting how the property is defined (e.g., individual condo units).
- **Administrative Modification: Selection of a New Baseline:** Proposing a baseline year after 2019 due to significant occupancy or usage changes.
- **Other**

This section could include more detail regarding the scope of relief and how the relief will apply to the Covered Property's or Campus' compliance going forward. Use this section to explain in detail to the Review Board why this relief is relevant to compliance with BEUDO.

## Energy Audit

BEUDO mandates that an energy audit be completed, especially as a means of unveiling low-cost actions that you may be able to take despite a hardship, or help you create a plan to decarbonize your building. Not every type of relief triggers an in-depth energy audit. You can choose a DIY audit for simpler requests or a professional study for complex ones. [Appendix A: Energy Audit Options](#) identifies which type of audit makes sense based on your requested type of relief.

For Long-Term Alternative Compliance Plans, which involve more significant deviations from the standard schedule, the audit will need to address:

- **Emissions Reduction Measures:** Potential for appliance substitution, envelope upgrades, and electrification.
- **Technical Constraints:** Physical limitations of the site or existing systems.
- **Financials:** Estimated costs and a review of available funding (e.g., Mass Save, IRA tax credits, or state incentives).
- **Phasing:** A clear plan on how work could be broken into stages to mitigate financial or operational hardship.

## Complete Application Checklist

A complete application includes the following components:

- Title page
- Application summary
- Application Body
  - Covered Property Information
  - Compliance Attestation
  - Qualifying Hardship Criteria
  - Evaluation of Flexibility Measures and Compliance Mechanisms
  - Relief Request
  - Energy Audit
- Signature of Covered Property Owner or authorized representative
- File attachments

## Application Submission

Submit all required materials via the BEAM Owner Portal by submitting a new ticket for a Hardship Compliance Plan Application. Direct links to these forms are as follows:

- [BEAM Form: Administrative Modification](#)
- [BEAM Form: Short- and Long-Term Alternative Compliance Plan](#)

To ensure an efficient review, please follow the naming convention for all files: CoveredPropertyID\_[DocumentCategory]\_[DocumentTitle].

- Application: Save this completed document as a PDF and sign.  
Example: CP999\_Application\_Short-term Alternative Compliance Plan.pdf
- Criteria Documentation: PDF of support for each hardship claimed  
Example: CP999\_Criteria\_Financial\_ProForma.pdf
- GHG Emissions Schedule: If requesting an alternative schedule, Excel file of completed GHG Emissions Schedule. Example: CP999\_GHGSchedule.xlsx
- Energy Audit: PDF of the results of your audit  
Example: CP999\_Audit\_ASHRAELevel1\_2026.pdf
- Optional: Supplemental files

Public hearings will not be scheduled until all required application materials are received and deemed complete. The Review Board has sole discretion to reject untimely applications if requirements are not met.

Electronic submissions should meet the following specifications:

- ▶ PDF format, readable by Adobe Acrobat v.7.0 and later
- ▶ Excel Emissions Schedule Template completed and uploaded as Excel file (.xlsx)
- ▶ All pages rotated so that the tops of all pages align with the top of the screen
- ▶ File sizes minimized and set to a resolution of roughly 150 dpi, if images are included
- ▶ No single file greater than 10 MB (volumes may be broken into separate files)
- ▶ Scanned documents processed with optical character recognition (OCR) software
- ▶ Do not write-secure (on request, City staff may secure files before posting to the website)

Any supplemental or amended application materials, including materials provided for continued hearings, should include a memo listing the new materials submitted, responses to information requests, and any changes to the plan.

## STEP 4: Hearing Timeline and Application Review by BEUDO Review Board

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### Phase 1: Submission and Completeness Review

- **Step 1: Initial Submission:** Submit all application materials via the [BEAM Owner Portal](#).
- **Step 2: Administrative Review:** The Office of Sustainability will perform a preliminary review to confirm your application is administratively complete.
- **Step 3: Confirmation of Completeness:** You will be notified once your application is deemed complete. This confirmation triggers the **65-day statutory window** for a hearing and decision. During this time, City staff will also prepare a recommendation for the [BEUDO Review Board](#).

### Phase 2: Scheduling and Preparation

- **Step 4: Hearing Invitation:** You will receive an email invitation for your hearing including the date, time, and administrative instructions for attending and presenting via Zoom.

- *Note:* Meetings take place on the first Wednesday evening of the month and the third Wednesday, as needed.
- **Step 5: Presentation Preparation (optional but recommended):** Begin preparing your slides as soon as you receive confirmation of a complete application. While slides are not mandatory, they are encouraged to assist in your presentation (15-minute max).
- **Step 6: Slide Submission Deadline:** If you plan to use a slide deck, it must be emailed to [BEUDOReviewBoard@cambridgema.gov](mailto:BEUDOReviewBoard@cambridgema.gov) no later than **5:00 pm on the Wednesday one week prior to your hearing**.
  - *Example:* If your hearing is on the first Wednesday of the next month, your presentation is due by 5:00 pm on the last Wednesday of the current month.

### Phase 3: Public Notice and Hearing

- **Step 7: Meeting Notice:** The Review Board meeting notice, including the agenda and Zoom link, will be posted to the [City's public meeting calendar](#) at least 48 hours prior to the meeting. Your application materials will be distributed to Board members at this time.
- **Step 8: The Hearing:** You or your representative will attend the virtual meeting to present your plan (15-minute limit) and answer Board Member questions.

### Phase 4: Decision and Next Steps

- **Step 9: Final Decision:** Within **65 days** of your application being deemed complete, the Review Board will issue its decision to approve, approve with conditions, or deny the application.
- **Step 10: Continuances, if applicable:** If the Board requires additional information, they may motion to continue the hearing to a later date. If the Board cannot issue a decision within 65 days, they may request an extension of time from the applicant.

## STEP 5: Comply with your Hardship Compliance Plan, and prepare to return to the standard schedule

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If your plan is approved, any new GHG targets are locked in and uploaded to BEAM. You will continue to report energy annually.

Once the approved duration of your Hardship Compliance Plan concludes, the Covered Property is required to immediately resume compliance with the standard annual Emission Reduction Requirements from Section 8.67.100. You must meet the standard targets active at that time, regardless of previous targets.

## Need more help?

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If you need additional support, submit this [Hardship and Deferral Plan Assistance Form](#) and we will direct you to additional resources.

For more detailed information, review BEUDO policy documents on the BEUDO page: [camb.ma/BEUDO](http://camb.ma/BEUDO).



**Stay Connected! Sign up for the latest BEUDO news and resources:**  
[cambma.gov/BEUDOupdates](http://cambma.gov/BEUDOupdates)

## Appendix A: Energy Audit Options

TABLE A. ENERGY AUDIT OPTIONS

Audit Type	Applicable Plan Type			Scope	Input Requirements	Complexity	Timeline for Results	Cost	Results
	Admin Mod.	Short term	Long term						
<a href="#">ENERGY STAR Portfolio Manager (ESPM)</a>	✓			For non-lab buildings, uses already-uploaded benchmarking data to analyze energy use, energy use intensity, and emissions over time.	12 months utility data	<b>Very Low</b> Already linked to BEAM account	Immediate	Free	<b>EnergyStar Score Report (1-100)</b> for eligible building types (excludes labs) <i>Compliance reporting, Benchmarking Comparisons, Trend charts (EUI, energy use, cost, GHG over time)</i>
<a href="#">Labs2Zero AIM Report</a>	✓			ESPM equivalent for lab buildings	Facility information (lab specific building type, location, lab area, fume hood quantity) Operational data (schedule and energy consumption, energy source(s))	<b>Low</b> Owner Links to ESPM account; Limited additional lab-specific data needed	Immediate	Free: Energy Score \$259/year for AIM report	<b>Energy Score (1-100) similar to ENERGY STAR Energy Score Card</b> , <i>benchmarking comparison to other lab facilities report and recommended ECMS</i>
<a href="#">DOE BETTER *with DOE ASSET Score</a>	✓	✓		Best fit for Covered Properties that are screening implementation strategies and developing a scope of improvement. This uses already-uploaded benchmarking data to analyze energy use, energy use intensity, and emissions over time.	Monthly Utility Data, Building Floor Area, Building Type	<b>Very Low</b> Owner links to ESPM account	Immediate	Free	<b>Graph of electricity and fossil fuel consumption</b> <i>EE Recommendations, Table of Estimates for Annual Energy + Cost Savings, GHG Emissions Reductions</i>
<a href="#">DOE ASSET Score *with DOE BETTER</a>	✓	✓		Used with DOE BETTER above. Requires building specific information to simulate the building and provide performance recommendations and upgrade opportunities.	Building geometry, Envelope, Lighting/Windows, HVAC details: Mechanical; Service; Water Heating	<b>Moderate</b> Owner fills out building and equipment data (User-Friendly Simulation)	Immediate	Free	<b>Asset Score (1-10)</b> system efficiency score based on simulation-based EUI <i>Upgrade Opportunities Structure and Systems Ranking and EUI</i>

Audit Type	Applicable Plan Type			Scope	Input Requirements	Complexity	Timeline for Results	Cost	Results
	Admin Mod.	Short term	Long term						
<a href="#">ASHRAE Level 1</a>	✓	✓		Owners may contact a qualified auditor to conduct a Level 1 study. Studies include a site visit performed by the qualified auditor.	Qualified auditor conducts introductory assessment involving a walkthrough, utility bill review, and building operation staff interviews	Low	Weeks	\$0.05-\$0.15/sqft	"Walk-through survey", Screening Audit, Identifies Urgent Operational Issues
<a href="#">Mass Save / Eversource Scoping Study</a>	✓	✓		Best fit for Covered Properties that are actively planning implementation, Owners may contact Eversource to request a study.	MassSave approved vendor tours building and reviews 12-month utility data provided	Moderate	Weeks	No cost to building owner, if eligible	Study with list of measures, rough cost/benefit estimates, next step recommendations
<a href="#">DOE MEASUR</a>	✓	✓	✓	Best fit for Covered Properties that are actively planning implementation of building retrofit. This requires a building inventor or equipment in order to recommend system-specific performance and recommended upgrades.	Equipment nameplate data (specification) + measured operating conditions	Moderate Equipment inventory + Technical User Required	Days	Free	<b>Technical, system-specific diagnostic outputs</b> Estimated Energy + Cost Savings Performance curves, recommended ECMs, system performance calculations
<a href="#">ASHRAE Level 2</a>	✓	✓	✓	Best fit for Covered Properties that are actively planning implementation of building retrofit, Owners may contact a qualified auditor to request a Level 2 Audit. Studies include a site visit performed by the external vendor.	Qualified auditor analyzes end use breakdowns, provides system-level analysis, and financial modeling for prioritized efficiency measures	Moderate	Weeks-months	~\$0.10-\$0.30/sqft	Field inspection, Detailed Audit, Computer Analysis, Recommended ECMs

Audit Type	Applicable Plan Type			Scope	Input Requirements	Complexity	Timeline for Results	Cost	Results
	Admin Mod.	Short term	Long term						
<a href="#">ASHRAE Level 3</a>	✓	✓	✓	Best fit for Covered Properties that are actively planning implementation of building retrofit, Owners may contact a qualified auditor to request a Level 3 Audit. Studies include multiple site visits performed by the qualified auditor.	Qualified auditor provides detailed field measurements, modeling, and vendor pricing to develop high confidence cost and savings estimates	High Technical Assessor Required	Months	~\$0.20-\$1.00/sqft	<i>Field inspection, Whole-Building Simulation + Computer Analysis, Recommended ECMs</i>
<b>Mass Save / Eversource</b> <a href="#">Comprehensive Building Assessment</a>	✓	✓	✓	Best fit for Covered Properties that are actively planning implementation of building retrofit, Owners start by contacting Eversource.	MassSave approved vendor conducts site visit and provides more detailed energy analysis and recommendations	High	Weeks to months	50% cost share	Investment-grade audit with electrification feasibility, financials, regulatory alignment, and implementation plan