

Can You Have Your Carrot And Eat It Too? Leveraging Building Performance Standards (BPS) To Reach New Customers

Grace Callahan, Lana Stern, Franklin Energy
Kathleen Belkhat, Energy Trust of Oregon
Beth Baxter, TRC Companies
Tina Schnell, ASK Energy

ABSTRACT

Energy efficiency program administrators and utilities have decades of experience motivating building owners to improve their buildings' energy efficiency using incentives or "carrots" to encourage actions. New building performance standards (BPS) are doing two things: attaching a "stick" to drive energy efficiency in existing buildings, and nudging previously unengaged building owners to look for support from their utilities. There is a limited window for utilities to engage these customers while requirements are fresh in their minds and compliance dates are still on the horizon.

This paper explores how utilities may be able to leverage BPS legislation to reach customers that have historically been less engaged in energy efficiency programs. We will describe a new program that distills core Strategic Energy Management (SEM) principles into a streamlined offering tailored to support building owners navigating BPS compliance. The cohort-style program will pilot an innovative method to enable self-directed treasure hunts through exciting group training events hosted at enrolled sites. Participants will receive tools and resources to support BPS compliance and energy reduction, hands-on coaching, and incentives for implementing energy projects.

In this paper, we will examine the strategic considerations behind designing this offering, including the trade-offs between creating fresh initiatives versus adapting existing programs and the strategies used to reach new customers and test the theory: could BPS be the key to achieving broader participation in energy efficiency programs?

Introduction

Most people are familiar with the "carrot and stick" motivational strategy that combines rewards (the carrot) and punishments (the stick) to obtain desired behaviors. This approach is used across many aspects of life, business, parenting, legislation, etc. The concept is flexible and can be adapted to many scenarios, weighing the reward or punishment more heavily depending on the expected impact on the audience. This motivational strategy often raises the debate of whether a carrot or stick is more impactful, and what the proper balance may be. The realm of energy efficiency is no exception. As depicted in Figure 1, there is a combination of carrots and sticks present to balance the barriers facing energy efficiency project implementation.

Carrots and Sticks of Energy Efficiency

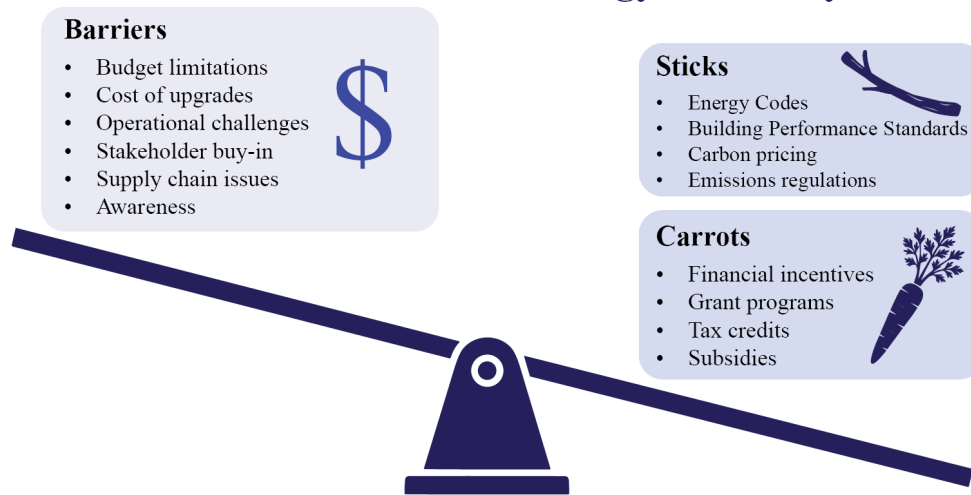


Figure 1. Carrots and sticks of energy efficiency

The Carrot: Energy Efficiency Programs

Electric and gas utilities across the country have been providing financial incentives to encourage energy efficiency since the 1970s (Cunningham, 2020). These incentives have become increasingly important in today's efforts to mitigate climate change and ease utility resource strain. Modern energy efficiency programs motivate behavior change, equipment upgrades and more through financial incentives and educational programming. As buildings become more efficient and technology becomes more complex, utilities and their implementers have to get creative with program design.

The authors of this paper are Energy Trust of Oregon (Energy Trust) representatives, including the program implementation consultants selected to implement Energy Trust's new BPS Pathway offering. Energy Trust is an independent nonprofit that administers a wide portfolio of energy efficiency programs on behalf of its funding utilities; Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista. Programs span residential, multifamily, commercial, industrial, agricultural and small business sectors and include cash incentives and technical assistance. Energy Trust has established a strong, trusted presence in Oregon and Southwest Washington by helping customers and communities reduce costs, save energy and benefit from renewable resources (Mission + Vision + Values, 2026). Energy Trust also pioneered the original Strategic Energy Management (SEM) program model alongside the Bonneville Power Administration (BPA) and the Northwest Energy Efficiency Alliance (NEEA) (Northwest Strategic Energy Management Collaborative, 2022). Energy Trust's SEM program now serves commercial and industrial sectors by supporting organizations to build and implement long-term, continuous energy-management practices (Consortium for Energy Efficiency).

Energy Trust offerings drive energy savings by providing a financial incentive as motivation for energy users. This approach has led to \$8.5 billion in customer utility bill savings

The Stick: Building Performance Standards

In 2023, the state of Oregon passed a statewide BPS, modeled closely after the policy Washington State adopted in 2019. As depicted in Figure 2, Oregon is one of four states who have successfully passed a statewide BPS as of 2025.

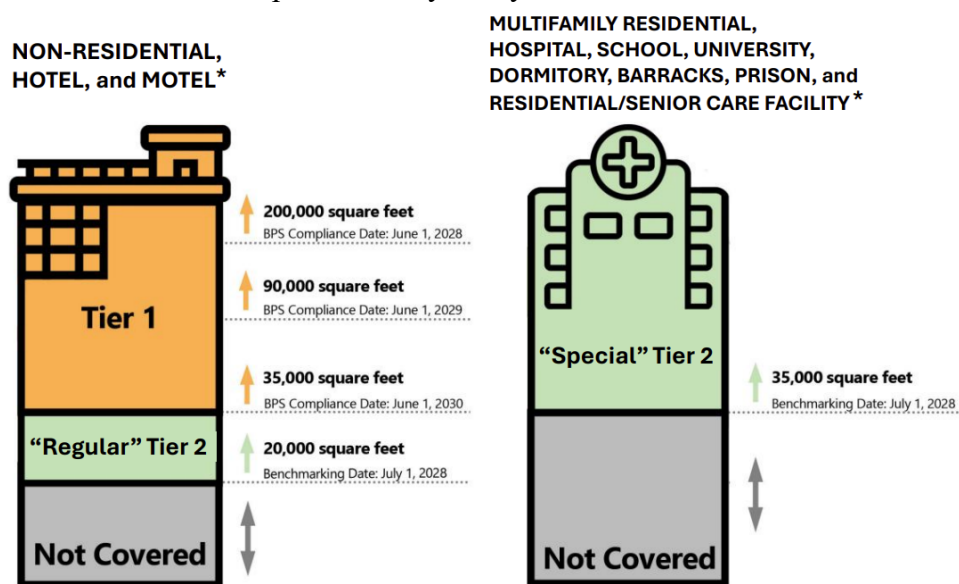
BPS Status, Metric

- Passed, Emissions
- Passed, Energy
- Passed, Both
- Under Consideration, NA

Updated with data as of 12/31/25

© 2026 ACEEE Summer Study on Energy Efficiency in Buildings

The Oregon standard applies to all commercial buildings over 35,000 square feet and some over 20,000 square feet. Oregon’s BPS requires all covered buildings to benchmark their energy usage in ENERGY STAR® Portfolio Manager®, determine a weather normalized (WN) energy use intensity (EUI), which quantifies energy use per building square foot, and calculate a building specific EUI target based on the average energy usage of similar buildings. Covered buildings fall into one two groups defined by the Oregon Department of Energy: Tier 1 and Tier 2, as depicted in Figure 3. Tier 1 buildings include most commercial buildings over 35,000 square feet that are not multifamily residential, hospital, school, university, dormitory, barracks, prison or residential/senior care facilities (Oregon Department of Energy, 2026). All other covered buildings are Tier 2. In addition to the benchmarking requirements described above, Tier 1 buildings must also demonstrate that their usage falls below their unique EUI target or must take steps toward achieving that target like identifying and implementing energy efficiency or renewable energy projects. This group is also required to develop an Energy Management Plan (EMP) and Operations and Maintenance (O&M) program to document ongoing efficient system performance and energy management practices. Tier 2 buildings are only required to meet the benchmarking requirements. Oregon’s policy includes annual fines that may be over \$40,000 for noncompliant Tier 1 buildings starting as soon as 2028, introducing a considerable stick into the energy efficiency equation for commercial building owners (Oregon Department of Energy, 2026). Compliance deadlines depend on building type and size as depicted in Figure 3, and buildings must resubmit for compliance every five years.



*Mixed-use buildings follow more detailed guidelines to determine their Tier

Figure 3. Oregon BPS Tier Definitions (Oregon Department of Energy, 2026)

Aligning Energy Policy and Energy Efficiency Programs

Utility energy efficiency programs are designed to motivate behavior through reward, typically in the form of a financial incentive. The method for determining the incentive, however, can vary depending on the program design. Some programs offer a defined incentive amount based on quantitative project characteristics, and others set incentives based on measured or estimated performance.

Energy policies, including energy codes and BPS, are designed to regulate energy usage, including a penalty in the form of fines or legal implications. Similar to energy efficiency programs, most energy policies define desired criteria based on quantitative elements but also provide performance pathways allowing professionals to use energy modeling or engineering calculations to demonstrate the estimated performance is equivalent to prescriptive metrics.

Energy codes often include a prescriptive approach to regulating energy usage within existing buildings. States with energy codes are typically modeled after ASHRAE 90.1 or the International Energy Conservation Code (IECC), which include provisions for existing buildings but are only triggered during additions, major alterations, or changes in occupancy type. When triggered, existing buildings are usually directed to meet the prescriptive requirements specified in the applicable energy code. These requirements include minimum efficiency metrics for a given piece of energy-using equipment or building envelope component. These prescriptive metrics were selected assuming a standard impact on performance for an average building.

Modern energy codes, like Oregon's Commercial Energy Code, offer prescriptive and performance pathways for new buildings. Buildings can ensure all equipment meets minimum prescriptive efficiency standards, or designers can provide modeling to estimate a building's future energy use and demonstrate that it will perform below a defined target. By providing these options, building owners have more freedom to choose how they achieve their energy efficiency target, while delivering the same desired outcome.

Traditional energy efficiency programs have used a similar approach to the prescriptive energy code pathway, incentivizing energy savings for certain building upgrades. While this approach allows utilities to issue incentives with a low administrative burden for implementers and customers, it restricts the types of energy savings actions that can be incentivized through this pathway. To address equipment upgrades that fall outside the boundaries of prescriptive assumptions, many utilities and implementers also offer custom incentive pathways. These projects still produce relatively stable, equipment driven energy impacts, which make their savings more predictable than behavioral changes and therefore suitable for bottom-up incentive calculations. This custom incentive approach is similar to the performance pathway in modern energy codes, where performance is predicted before a building is constructed, allowing for more complex or high efficiency design. This alignment between performance energy codes and custom energy efficiency incentives is depicted in Figure 4.

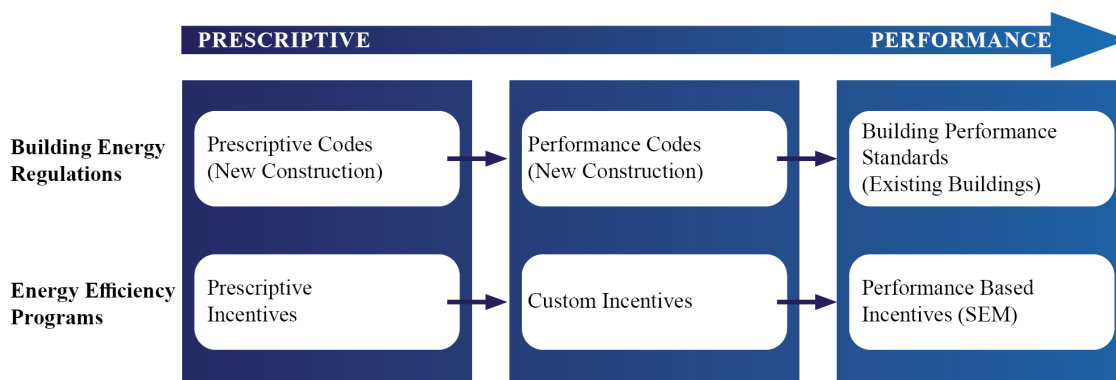


Figure 4. Alignment of Energy Efficiency Programs and Building Codes

Prescriptive and custom approaches can break down when applied to behavioral or O&M style energy savings opportunities. Energy Trust and other energy efficiency program implementers have designed programs to address this gap by incentivizing actions based on performance. Unlike custom capital improvements, which produce quantifiable and durable equipment-related savings, behavioral and O&M actions depend on human behavior, operating schedules, staff consistency and institutional practices. Savings can fluctuate significantly and may degrade over time (Kociolek, 2017). This variability can make it difficult to apply the bottom-up engineering estimation methods used for both prescriptive and custom incentive approaches. As a result, utilities and implementers have turned to top-down performance-based structures to calculate energy savings from behavioral and O&M opportunities. These approaches shift the focus from estimating savings in advance to measuring actual performance over time. There are several program designs that leverage this methodology including SEM, retrocommissioning (RCx), pay for performance, and others. This performance approach to energy efficiency programming is well aligned with BPS policies that regulate based on a performance metric like EUI, as depicted in Figure 4.

When combined, energy policies and utility energy efficiency programs can accomplish a carrot and stick methodology to catalyze the desired outcome: energy savings. Energy policies provide a framework for regulating energy efficiency with code violations and associated penalties as a punishment, while utility energy efficiency programs reward energy efficiency that is above and beyond code, through financial incentives. By understanding the prescriptive and performance frameworks of each, and coordinating the designs accordingly, we can maximize the impact of both levers to achieve the desired outcome.

SEM and BPS – A Performance-Based Carrot and Stick

In 2011, Energy Trust launched and continues to run the first commercial SEM program, which provides performance-based incentives for participants. To accomplish this, the program measures energy consumption using top-down linear regression models to quantify a year over year savings value. Participants are then rewarded based on their actual performance. This top-down regression modeling approach is one of a few approaches used today to quantify SEM savings across different programs.¹

Because it measures whole building performance, SEM can capture behavioral and O&M savings in a way prescriptive and custom programs cannot, making it a natural fit for these types of measures. Multiple papers document typical SEM use of top-down regression to quantify operational and behavioral savings (Volkman, Schick, Kesting, & Belkhat, 2013). This approach allows Energy Trust to provide incentives for projects and actions that are otherwise difficult to quantify. While SEM evaluations highlight measurement challenges and savings persistence barriers, this program model is one of few effective strategies for incentivizing O&M style energy projects (Kociolek, 2017). Through SEM, participants learn energy management fundamentals and are trained to identify and implement low and no cost O&M and behavioral projects to achieve energy savings at their enrolled buildings.

Most BPS policies reflect this same shift toward performance-based regulation. Instead of taking a prescriptive approach to regulating energy use, Oregon's BPS measures building energy performance and establishes performance targets based on actual reported data, just like SEM.

¹ Linear regression modeling may be supplemented with alternative savings measurement methods (e.g. bottom-up calculations) in some cases (Therkelsen, 2021).

Instead of linear regression modeling, Oregon's BPS relies on a top-down WN-EUI generated by ENERGY STAR® Portfolio Manager®. The EUI, as calculated in Portfolio Manager, represents the total amount of energy a building uses per square foot of floor area over the course of a year. As described above, some buildings covered by Oregon's BPS will be required to lower their energy usage to meet their EUI target prior to their compliance deadline.

Regulating and incentivizing based on actual performance is a direct approach to achieving the ultimate objective of energy policy, and energy efficiency incentive programs. When aligned, building owners are motivated through both incentive and punishment to achieve measured energy savings. This makes SEM the perfect complement to BPS to maximize impact.

Energy Trust's SEM program includes several components that complement the requirements and structure of Oregon's BPS, making it a great program for customers seeking BPS support. The performance-based modeling used to document SEM impact is well-aligned with the performance-based EUI requirements of the standard. In addition, SEM's emphasis on O&M measures, preventative maintenance, and organizational energy efficiency practices is well aligned with the EMP and O&M program requirements within Oregon's BPS. For these reasons, Energy Trust's SEM program is a natural choice for customers looking for Oregon BPS compliance support.

Serving customers subject to Oregon's BPS through SEM is appealing because it only requires minor modifications to the program's curriculum and is a demonstrated and reliable program within Energy Trust's portfolio. SEM has also been proven to facilitate broader program engagement and additional energy savings via capital projects, making the program an excellent gateway to broader Energy Trust engagement for the customer (Chapman, et al., 2024). A 2018 evaluation of Energy Trust's Existing Buildings program found that a commercial building enrolled in SEM is 16.6 to 26 percent more likely to complete a capital project in the first or second year of SEM participation compared to a commercial building that is not enrolled in SEM (Evergreen Economics, 2019).

Historically, SEM has been a beneficial program for many customer types, but it has not been a perfect fit for all sectors. SEM requires a significant investment of time from participants. To be successful, participants must attend and facilitate monthly energy team meetings, foster internal support, acquire management buy-in, monitor energy usage, and commit to consistent O&M process improvements to achieve savings. Customers who own or manage large portfolios, have an existing commitment to sustainability, and possess the capacity and influence to implement SEM practices across their portfolio are well-suited to be successful in the SEM program.

While the SEM program has served a variety of customer types well, Energy Trust has struggled to solicit and maintain engagement from other customers, such as commercial property management firms, often citing lack of time and resources to dedicate to the program. This means that potential behavioral and O&M style savings opportunities will go unrealized, not to mention the missed potential of capital project incentives, as SEM participants often engage in multiple incentive programs once enrolled. Oregon's BPS has introduced a new motivation for building owners across the state, and Energy Trust recognized this as an opportunity to introduce SEM-style O&M energy projects and the associated savings to new customers.

Energy Trust of Oregon's BPS Pathway

Following the legislation of Oregon's BPS, Energy Trust began conversations to determine how to best support customers who are covered by the new rules. Washington was the first state to pass a statewide BPS, and Washington utilities have since tested offerings to support their customers with compliance, providing frameworks, successes, and learning opportunities for Oregon program design.

In Washington, Puget Sound Energy (PSE), Seattle City Light / Office of Sustainability & Environment, and Snohomish Public Utility District implement the major BPS compliance assistance programs. PSE's Clean Buildings Accelerator demonstrates the stand-alone BPS assistance model where participants are provided with BPS assistance and then are transitioned into other energy efficiency programs offered by the utility (Get Expert Help from PSE on Clean Buildings Law Compliance, 2024). All three of these programs follow this same general model. A detailed investigation of utility programs supporting BPS compliance and the key considerations for utilities, regulators and jurisdictions is presented in "Compliance Catalysts: How DSM Programs Enable BPS Success", also accepted for the 2026 ACEEE Summer Study.

Energy Trust has a variety of offerings available to customers subject to Oregon's BPS requirements. However, none of the existing offerings meet the needs of customers who are time and resource constrained but need BPS support. Existing offerings like the custom and standard incentive program can help offset the costs of upgrades needed to lower EUI for BPS compliance, but do not include BPS and benchmarking curriculum or direction on completing the EMP and O&M program requirements of Oregon's BPS. As discussed above, SEM is an excellent fit for customers seeking BPS support and provides financial incentives that can offset costs associated with energy savings. Due to SEM's close alignment with BPS requirements, Energy Trust determined that minor modifications to the existing SEM program will serve both existing and future participants' BPS support needs. However, SEM requires significant time and commitment from participants, leaving out customers with time and resource constraints. Energy Trust identified this as an opportunity to design a new BPS offering, based on the successful framework of SEM, but with modifications to make participation more feasible for customers who were unable or unwilling to participate in SEM. This new program will provide a performance-based offering for customers that do not participate in SEM, broadening the availability of complimentary programs for customers covered by Oregon's BPS.

Program Design

The new Energy Trust offering is called BPS Pathway and is designed to serve customers who are not engaged in SEM whether due to size, organizational readiness, or other challenges. The offering will incorporate the core SEM components that align with BPS requirements and encourage participants to achieve low and no cost savings through improved O&M practices.

BPS Pathway is unique in several ways. First, the program was designed and marketed to customers who are focused on BPS compliance requirements, allowing it to attract and serve customers that were previously not being served by programs marketed to promote energy efficiency. Second, the program is based on a proven delivery framework, SEM, but is modified to emphasize BPS compliance, with advanced SEM topics removed. Third, the program incorporates the successful milestone incentive framework leveraged by SEM, further setting this program apart from existing BPS support offerings in the market.

To reach customers that were not interested in SEM previously, the offering was designed to be short-term and a lighter touch than traditional SEM. To do this, we left out SEM's broader curriculum about developing an energy team, continuous improvement and occupant engagement. We focused instead on core O&M and energy assessment best practices and added information about the BPS O&M program and EMP requirement. Hands-on support from energy coaches is also limited for BPS Pathway participants, which reduces the time commitment from the participants, forces them to "learn how to fish" and enables coaches to serve more customers, increasing cost effectiveness. The primary areas of overlap and deviation between SEM and BPS Pathway are depicted in Table 1. While much of the content in the BPS Pathway workshops is embedded in SEM fundamentals, it's delivered through the lens of BPS compliance, centralizing the customers' priorities.

Table 1. Content comparison of SEM to BPS Pathway

Component	SEM	BPS Pathway
1:1 Coaching	Yes - monthly	Yes – limited to 6 calls during engagement period
Treasure Hunt Training Events	No	Yes
Treasure Hunts	Coach facilitated	Self-Directed
Building Automation System Reviews	Yes	Yes
Curriculum	-	-
Energy Team & Executive Engagement	Yes	No
Continuous Improvement	Yes	No
Occupant Engagement	Yes	No
O&M Practices	Yes	Yes
Energy Project Identification	Yes	Yes
Duration	12-months with optional year over year enrollment	12-months fixed
Incentives	Performance + Milestones	Milestones

The BPS Pathway program is a 12-month cohort-style program that provides 1:1 coaching, three virtual workshops covering energy efficiency and BPS curriculum, treasure hunt training events and templates for key BPS requirements. The engagement is front-loaded, so that most of the training and engagement is conducted within the first six months. The program experience timeline is depicted in Figure 4. The goal is for participants to prioritize project implementation early, so that EUI reduction can be seen by the end of the 12-month period.

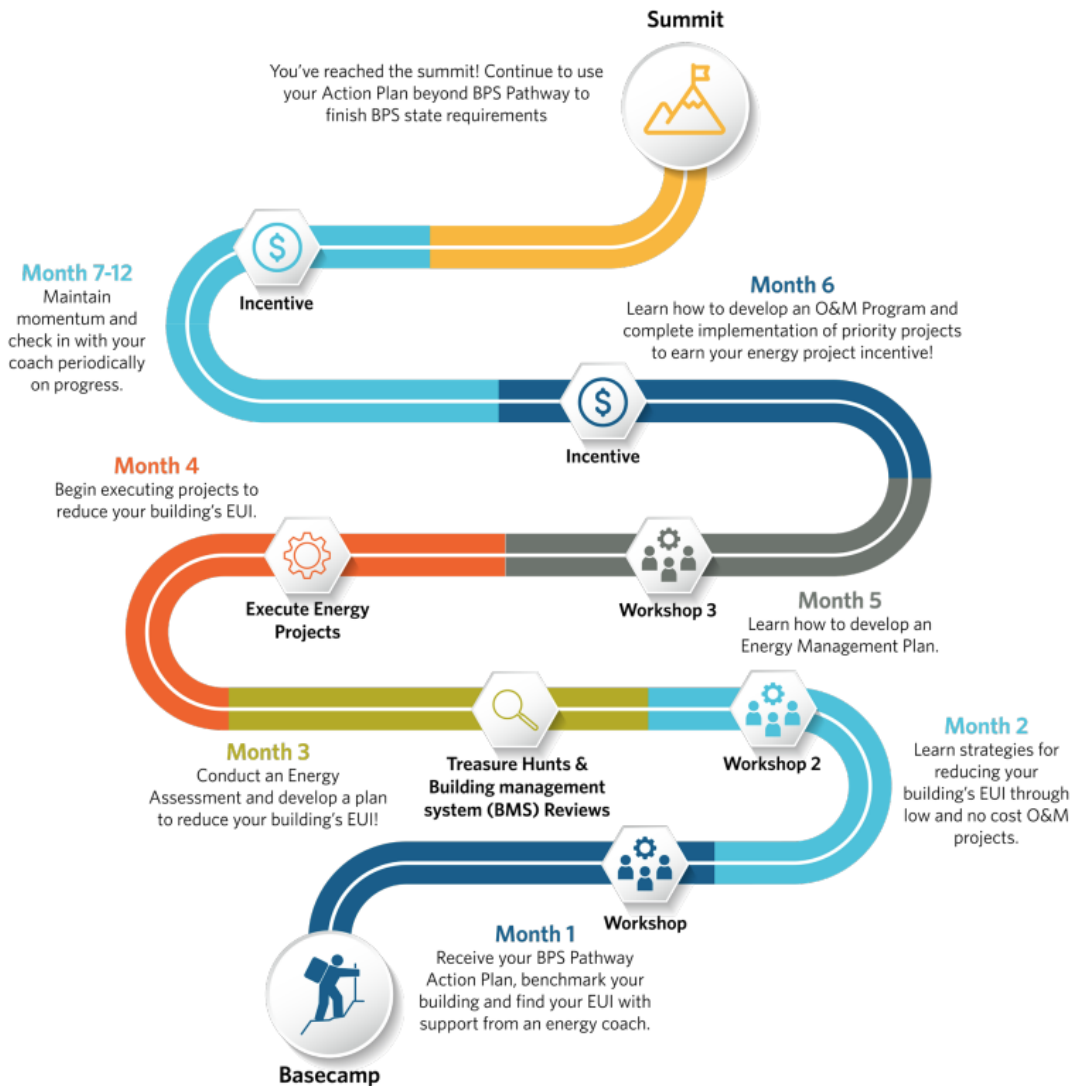


Figure 5. BPS Pathway program timeline. Source: BPS Pathway Factsheet

Another key deviation from the SEM program is the incentive structure of BPS Pathway. The program does not provide performance-based incentives for BPS Pathway participants. Instead, BPS Pathway provides milestone incentives for project execution and data reporting. While SEM also offers milestone incentives for participants, savings are usually rewarded through the program's performance incentives. BPS Pathway participants will share ENERGY STAR® Portfolio Manager® data with the coaching staff to demonstrate energy savings through WN-EUI metrics.

BPS Pathway is designed as an alternative to SEM and is not intended to funnel graduates from BPS Pathway into SEM. It is however, intended to facilitate the same broader program engagement and spillover savings that SEM has historically triggered. In turn, SEM participants may not enroll in BPS Pathway. Energy Trust's SEM curriculum has been modified to provide all the BPS support that is available through BPS Pathway, so there is no reason for SEM participants to enroll in both. This is a key deviation from many existing programs where

BPS accelerators are designed as a first touch that will then deliberately hand off graduates to SEM or other existing programs.

A key innovation of the BPS Pathway program is the energy assessment and treasure hunt training curriculum. A treasure hunt is a cornerstone activity of the SEM program. Treasure hunts are structured, on-site events where staff systematically identify low and no cost opportunities to improve energy efficiency with the support of their energy coach. SEM participants receive regular coach-facilitated treasure hunts during their SEM engagement. While this is a key benefit of SEM participation, it is also a significant lift for both the participant and the energy coaches. To further streamline the design of BPS Pathway, Energy Trust decided to eliminate individual treasure hunts for BPS Pathway participants. Instead, coaches will design and lead four treasure hunt training events. These group trainings will provide participants with the tools and confidence to conduct their own self-directed treasure hunts at their sites with the added benefit of peer-to-peer learning in an in-person setting. This model will allow for broader implementation of treasure hunts with a smaller coaching staff. Participants will also have the freedom to execute their treasure hunts on their own schedule without the need to coordinate with program staff.

This program presents an exciting opportunity to incentivize O&M energy savings for customers that do not enroll in SEM. If successful, the trimmed-down program design and added pressure from the new legislation will bring new customers to engage with Energy Trust through BPS Pathway.

Recruitment Strategies

The recruiting team cast a broad net while recruiting for the first BPS Pathway cohort. We deployed several recruiting tactics to reach eligible customers. One strategy included cold calling and emailing customers that appeared to be covered by Oregon's BPS based on available data, paired with a call to action to attend a monthly recruiting webinar that covered program details and answered questions from the group of attendees. This approach was generally successful, and most recruiting webinars were followed with requests to enroll.

In an attempt to reach customers in specific customer segments and geographic areas, the recruiting team coordinated with Energy Trust Energy Advisors assigned to specific sectors and regions. Energy Advisors are responsible for developing customer relationships and connecting commercial customers to available Energy Trust incentives. By leveraging existing relationships and educating Energy Advisors on the program details, we were able to reach additional customers. While we were particularly interested in serving houses of worship through this offering, each customer identified was missing a key qualifier to enroll (building size, utility service area etc.) and none were successfully recruited for the first BPS Pathway cohort. Similarly, while rural Energy Advisors were engaged, the first BPS Pathway Cohort was filled with primarily metro area buildings. More on this in the following "Early Enrollment Findings" section.

The third primary recruiting tactic was in-person engagement events. We pursued several opportunities to recruit new participants in-person at networking events or at stand-alone presentations. Of these, the presentation-style engagement events seemed to be the most impactful. 71% of buildings in the first BPS Pathway cohort were enrolled following an in-person engagement effort from our recruiting team. In early 2026, we delivered an educational open house in partnership with the Oregon Department of Energy that covered the new offering and some basics about Oregon's BPS. The event was well attended, but primarily by fellow

energy efficiency industry professionals rather than building owners. However, the event did yield one enrollee in the first cohort and was an effective channel to get the word out about the new program. Energy Trust also hosted an event with a lunch-and-learn format at a property management firm who submitted an inquiry through the program website. This event was the single most successful recruiting event for the first BPS Pathway cohort, representing over half of the buildings enrolled in the first cohort. Due to the success of these events and the positive feedback received, we intend to pursue several similar education and recruitment focused speaking opportunities in 2026 to recruit for the second cohort. With four months left in the recruiting period for the second BPS Pathway cohort, half of the planned in-person recruiting events are outside of the Portland metro area to promote smaller urban area engagement.

Early Enrollment Findings

As of May 2026, the first BPS Pathway cohort is fully enrolled and the program is underway. The cohort will support 80 buildings across a variety of building types including municipal, office, retail, entertainment/public assembly, healthcare and non-exempt industrial.² While the property types varied, property managers represent 90% of enrolled buildings in the first cohort. This market segment has engaged with the SEM program before, but not to the degree that we saw for BPS Pathway. In comparison, property management firms represent less than 5% of the sites enrolled in Energy Trust's SEM Program.

Oregon's BPS separates covered buildings into two tiers. Tier 1 buildings are required to benchmark and meet an EUI target, while Tier 2 buildings are only required to benchmark. For this reason, the recruitment team targeted Tier 1 buildings to ensure that enrolled buildings would be motivated to lower their energy usage for BPS compliance, and Tier 2 buildings were directed to SEM. Consequently, the first BPS Pathway cohort did not include any building types that automatically fall into the Oregon Department of Energy's Tier 2 category. These building types include multifamily, hospital, school, university, dormitory, barracks, prison and residential/senior care facility.

The geographic distribution of the first cohort was heavily weighted in the Portland metro area, as depicted in Figure 6, with only one building located elsewhere. The reasons for this are likely to be layered. First, most buildings covered by Oregon's BPS are within the Portland metro area, also depicted in Figure 6, and include the largest buildings with the nearest compliance deadlines. Second, the recruiting team resides primarily in the Portland metro area, thereby taking advantage of in-person recruiting opportunities in this area. To balance this, the recruiting team plans to intentionally focus on buildings outside of Portland's metro area for the second cohort.

² Industrial buildings with 50% or more of their square footage dedicated to manufacturing are eligible for exemption from Oregon's BPS, leaving many industrial building types subject to the full requirements.

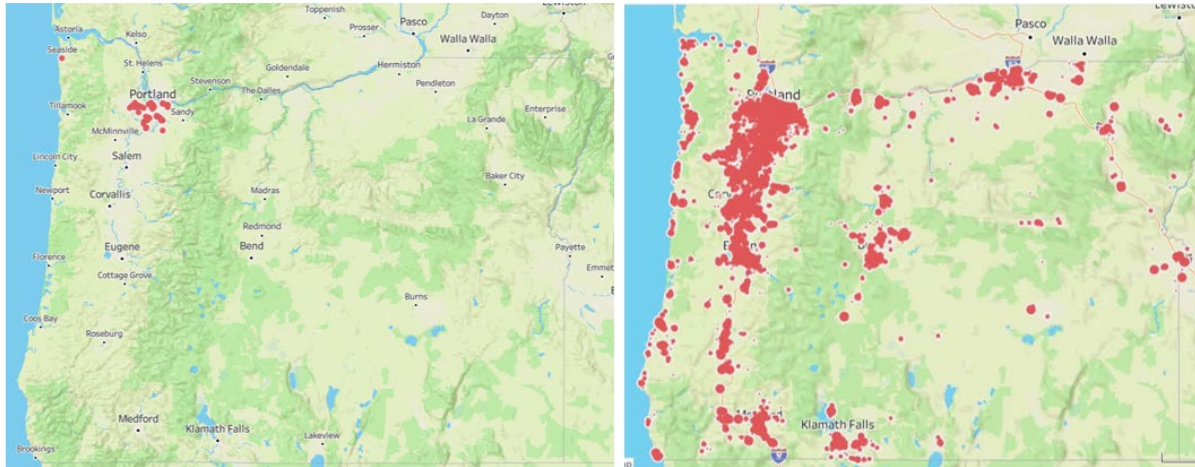


Figure 6. Spatial distribution of buildings participating in BPS Pathway (left) and covered by Oregon's BPS (right).

(Left) Locations of buildings enrolled in the first BPS Pathway Cohort, concentrated primarily in the Portland metropolitan area with one additional site in Seaside which is on the northern coast.

(Right) Distribution of Oregon buildings potentially covered under Oregon's BPS. Each point represents a building, with marker size scaled by gross floor area.

Source: Oregon Department of Energy (public records request)

We were excited to examine whether the buildings enrolled in BPS Pathway were new recipients of Energy Trust support. Table 2 summarizes several historic engagement metrics for the inaugural BPS Pathway cohort. Program engagement records revealed that 24% of enrolled buildings had never participated in an Energy Trust offering before, 71% had participated in Energy Trust's standard or custom incentive track offerings, and 5% had previously participated in SEM, but are no longer enrolled in the program for various reasons.

Table 2 BPS Pathway participant engagement history

Energy Trust program participation history	Qty	Percent of total buildings enrolled
None	19	24%
Standard or custom offering only	57	71%
SEM	4	5%
Total	80	100%

This data suggests that the BPS Pathway design successfully appealed to customers who had not previously engaged with Energy Trust's SEM offering. While most enrollees had engaged with Energy Trust through the standard or custom incentive track, we successfully recruited 19 buildings that had not previously engaged with Energy Trust programs at all, representing almost a quarter of the inaugural cohort. By engaging these customers through BPS Pathway, they are more likely to pursue other incentive offerings available from Energy Trust, assuming a parallel effect to that of SEM, as discussed previously. In addition, while 61 buildings had engaged with Energy Trust programs previously, only four of those sites had participated in SEM. This means that 95% of the enrolled buildings will be experiencing SEM-

style coaching for behavioral and O&M savings opportunities for the first time through the BPS Pathway program.

Program Impact

The savings goals for the BPS Pathway program reflect the newness of the design and uncertainty regarding the impact of its deviation from the SEM framework. We aim to achieve one percent electric and three percent gas savings for the first cohort which equates to approximately 717,000 kWh and 27,000 therms of savings. While these goals reflect an annual savings target for the cohort, the 12-month implementation period limits the true claimable savings potential to roughly six months because of the expected timing of energy efficiency measure implementation for participants. The deadline for the project implementation milestone for BPS Pathway participants is six months after program enrollment, meaning that most participants won't start seeing the impact of their actions on their energy bills until months 7-12.

BPS Pathway savings will also be largely dependent on how the properties benchmark and how that impacts the participants priorities for project execution. Most buildings enrolled in the first BPS Pathway cohort did not benchmark and calculate their target until after the program launch date. This means that many participants learned that some of their buildings were already meeting their energy target, and no energy savings actions were required to achieve compliance with the BPS. To participate in BPS Pathway, customers must commit to the intention of EUI reduction through project implementation regardless of proximity to their EUI target, and the program milestones are structured to incentivize this. However, it is anticipated that participants will be less motivated to prioritize actions at buildings that are meeting their EUI target within the time period that would result in significant claimable savings.

We are confident that the BPS Pathway program will lead to broader program engagement and spillover savings across Energy Trust's portfolio because we will refer participants to additional offerings and connect them to Energy Trust Energy Advisors. We plan to monitor that impact by measuring the percentage of participants that enroll in other Energy Trust offerings within two years of BPS Pathway enrollment. While the projected savings for the BPS Pathway program may seem comparatively small, the spillover effect has potential for significant contribution to the success of the broader portfolio over time.

Conclusions

Oregon's BPS presents a unique opportunity for Energy Trust of Oregon to rethink how they support commercial customers to achieve energy efficiency. While utility programs have traditionally relied on incentives as carrots to motivate action, BPS introduces a powerful regulatory stick that shifts customer attention toward operational performance and compliance obligations. By pairing these two forces, utilities can reach and support building owners who previously lacked the motivation, capacity, or awareness needed to engage with energy efficiency offerings.

The early design and implementation of BPS Pathway demonstrates how performance-based regulation can expand the reach of utility programs. Customers who have historically not engaged with SEM or other performance-oriented offerings are showing interest when facing BPS deadlines and potential penalties. This new motivation enabled us to introduce foundational SEM practices such as energy coaching, treasure hunts, and energy management

planning to customers who previously would not have pursued them. As a result, BPS Pathway is expected to unlock O&M and behavioral savings for previously unengaged customers.

The alignment between SEM fundamentals and BPS requirements also points to a long-term opportunity. BPS Pathway exposes customers to the tools, habits, and performance-tracking approaches that underpin SEM success, but in a lighter-touch format that reduces the barriers associated with full SEM enrollment and markets to the customer's priorities. Over time, this model can serve as a pipeline that strengthens organizational energy management practices across Oregon's commercial sector. As participants grow more familiar with performance-based thinking and operational improvements, they may be increasingly prepared to transition into deeper, longer-term engagements.

Although participation data from the inaugural BPS Pathway cohort is preliminary, it already suggests meaningful implications for utility program reach and effectiveness. The predominantly high enrollment from property management firms, and the engagement of customers who have never previously participated in Energy Trust offerings, highlight how BPS can activate new segments of the market. If this pattern continues, utilities will be better positioned to cost-effectively deliver savings and influence whole-building performance.

Looking ahead, the success of BPS Pathway will depend on continued evaluation, adaptive program design, and close coordination with Oregon's evolving regulatory framework. As more jurisdictions adopt BPS policies, Oregon's approach offers a replicable model for pairing compliance requirements with thoughtful, accessible utility support. By embracing performance-based program structures that acknowledge the complexities of O&M and behavioral savings, utilities can ensure that BPS becomes not only a compliance mandate but also a catalyst for long-term customer engagement and energy performance improvement.

In this way, BPS Pathway exemplifies how utilities can leverage a policy stick to extend the impact of their traditional carrot, ultimately driving deeper, more durable savings across the commercial building landscape.

References

- Chapman, L., Banta, K., Helvoigt, T., Monohon, S., Gage, L., Rodriguez-Anderson, S. M., & Lee, H. (2024). *SEM - Break Down Barriers and the Savings Persist*. ACEEE Summer Study on Energy Efficiency in Buildings.
- Consortium for Energy Efficiency. (n.d.). *Consortium for Energy Efficiency Strategic Energy Management Minimum Elements*. Retrieved from semhub.com: <https://semhub.com/resources/cee-strategic-energy-management-minimum-elements>
- Cunningham, L. J. (2020). *Renewable Energy and Energy Efficiency Incentives: A Summary of Federal Programs*. Washington, D.C.: Congressional Research Service (Library of Congress) [search.lib.jmu.edu].
- Duer-Balkind, M., Boyce, A., Ravulapati, R., & Sharrow, L. (2024). Lessons from the Ground: Implementing Building Performance Standards. *ACEEE Summer Study*.
- Energy Trust of Oregon. (2025). *2026-2030 Multiyear Plan*.
- Evergreen Economics. (2019). *2018 Existing Buildings Process Evaluation*.
- Get Expert Help from PSE on Clean Buildings Law Compliance*. (2024). Retrieved from Washington State Department of Commerce: <https://www.commerce.wa.gov/get-expert-help-from-pse-on-clean-buildings-law-compliance/>
- Hart, Z., Majersik, C., & Eagle, J. (2022). *Transformation in the Energy Efficiency Landscape: Leveling up Building Performance Standards*. ACEEE Summer Study.

- Kociolek, E. (2017). Evaluating Strategic Energy Management – Lessons Learned. *IEPEC Conference*.
- Mission + Vision + Values*. (2026). Retrieved from Energy Trust of Oregon: <https://www.energytrust.org/about/who-we-are/mission-vision-values/>
- Northwest Strategic Energy Management Collaborative. (2022, October). *The Northwest Roots of Strategic Energy Management*. Retrieved from semhub.com: https://semhub.com/assets/resources/NW-Roots-of-SEM_10.15.22.pdf
- Oregon Department of Energy. (2026). *BPS 010 Incentives and Penalties*. Retrieved from Oregon Department of Energy: <https://www.oregon.gov/energy/save-energy/Documents/BPS010-Incentives-penalties.pdf>
- Oregon Department of Energy. (2026). *Building Energy Performance Standards*. Retrieved from Oregon Department of Energy: <https://www.oregon.gov/energy/save-energy/Pages/BPS.aspx>
- Sims, E., & Malinowski, M. (2026). *Designing Utility Programs and Credit Models for BPS Support*. ACEEE.
- Therkelsen, P. F. (2021). *Strategic Energy Management Program Persistence and Cost Effectiveness*. North American Strategic Energy Management Collaborative.
- U.S. Department of Energy Building Energy Codes Program*. (2025). Retrieved from DOE Energy Codes Infographics: <https://www.energycodes.gov/infographics>
- Volkman, J., Schick, S., Kesting, O., & Belkhat, K. (2013). *Energy Trust of Oregon and Commercial Strategic Energy Management: A Catalyst for Accelerating Customer Energy Savings*. Portland, OR.

Acknowledgements

AI-assisted tools used: Microsoft Copilot. Used for: editing suggestions and organization. Extent: light editing. Human review: All content and citations were verified by the authors.