

Exhibit No. 13

Missouri Gateway Green Building Council – Exhibit 13
Consumer Comment Submitted December 9, 2024, in OX-2025-0106
File No. OX-2025-0104, OX-2025-0104, OX-2025-0106



December 9, 2024

To the Missouri Public Service Commission:

As an organization focused on green building education and outreach, Missouri Gateway Green Building Council opposes any efforts by the PSC to make building energy use data less accessible as potentially outlined in case OX-2025-0106.

Energy efficiency is the foundation of a greener building. One of the best energy efficiency and building management best practices is benchmarking energy and water use. Any efforts to restrict access to whole-building utility data is a threat to this building best management practice of benchmarking used widely throughout the building industry to track and improve building energy performance. Benchmarking is often required to qualify for federal and other incentives needed to modernize our buildings.

Currently, Ameren and Spire provide aggregated whole-building data to building owners, operators and their agents at no charge. We encourage the PSC to continue allowing utilities to provide this data for free in order for buildings to accurately track energy use and so that property owners can comply with benchmarking ordinances in the City of St. Louis and Kansas City.

The PSC should support utility data access, not restrict it. In addition to benchmarking, access to utility data can help prospective tenants understand the costs associated with an apartment. And many municipalities also regularly request utility data to develop and update greenhouse gas inventories. All these needs for utility data access and transparency should be supported by the PSC. By aggregating the data, consumer privacy is protected. Please don't make it more challenging or costly to obtain data.

Sincerely,

A handwritten signature in black ink that reads "Emily Andrews".

Emily Andrews
Executive Director