



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF  
ENERGY AND ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENERGY RESOURCES**  
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**Maura T. Healey**  
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**Kimberley Driscoll**  
Lt. Governor

**Elizabeth Mahony**  
Commissioner

October 31, 2025  
By Email

Chair Michael J. Barrett  
Senate Committee on Telecommunications,  
Utilities and Energy  
Room 312-B

Chair Mark J. Cusack  
House Committee on Telecommunications,  
Utilities and Energy  
Room 43

Office of the Clerk of the House  
Honorable Steven T. James, Clerk  
Room 145

Office of the Clerk of the Senate  
Honorable Michael D. Hurley  
Room 335

Dear Honorable Clerks and Chairs:

In 2022, the Legislature enacted G.L. c. 25A, § 20, requiring DOER to collect and share data on the energy use of buildings with a gross floor area of 20,000 square feet or greater. This letter constitutes DOER's annual report for 2025 under G.L. c. 25A, § 20(f) and 225 CMR 27.10(2). In 2024, DOER developed regulations on the reporting of this information (225 CMR 27.00) and hired a team to assist in communicating with constituents and collecting and collating usage data. The policy requires electric, gas, and steam utilities to report usage data for buildings directly to DOER and requires building owners to report any other energy usage, including delivered fuels and on-site renewable generation.

2025 is the first year of identifying and collecting energy data from buildings throughout the Commonwealth. As anticipated, and in spite of a wide-ranging outreach and education campaign, DOER found challenges along the way. So far, the data reported is incomplete and is still being vetted and validated for accuracy, but DOER, utilities, and building owners took significant steps to meet the statute's directives.

## Engaging Building Owners

DOER identified over 35,000 buildings for its draft list of covered buildings. Over the course of a year, DOER sent 34,000 letters and 38,000 emails, processed over 22,000 unique owner inquiries, and held nine info sessions and eight office hours sessions to answer questions. DOER's Green Communities and Leading by Example Divisions conducted extensive outreach on reporting with their public building owner constituents. In addition, DOER also engaged with representatives of large building owners to explain the policy and to ensure understanding of the reporting process by presenting directly to the Massachusetts Municipal Association, Local Initiatives Support Corporation (LISC), Massachusetts Chemistry & Technology Alliance (MCTA), and the Executive Office of Housing and Livable Communities. Finally, DOER and its vendor partner met regularly on an ongoing basis with individual building owners to assist them with navigating the program. DOER will continue to meet with stakeholders prior to the 2026 reporting season.

## Initial Data Findings

The final list of results covered 32,991 buildings (a total of 2,607,490,144 square feet of gross floor area). Owners of buildings on this list claimed 13,174 of them, providing DOER with up-to-date owner contact information and taking the first step to engage with the program. To date, DOER has full or partial energy data for 14,014 buildings. Further, Table 1 shows the fuel used in buildings with reported data, broken down by fuel type, for these buildings. Table 2 shows total number of buildings, energy use, and emissions by building type. Interested stakeholders can find the complete dataset linked at [mass.gov/buildingenergyreporting](https://mass.gov/buildingenergyreporting).

**Table 1: Fuel Usage and GHG Emissions by Fuel Type**

| <b>Fuel Type</b>              | <b>Count of Reported Buildings</b> | <b>Total Annual Fuel Usage (kBtu)</b> | <b>Total Annual GHG Emissions (MTCO<sub>2</sub>E)</b> |
|-------------------------------|------------------------------------|---------------------------------------|-------------------------------------------------------|
| <b>Electricity – Grid</b>     | 8,562                              | 23,278,429,383                        | 1,419,984                                             |
| <b>Natural Gas</b>            | 9,816                              | 639,914,746,574                       | 33,985,872                                            |
| <b>District Steam</b>         | 280                                | 75,216,065,090                        | 4,994,347                                             |
| <b>District Hot Water</b>     | 52                                 | 6,509,759,062                         | 432,248                                               |
| <b>District Chilled Water</b> | 107                                | 1,288,759,514                         | 95,226                                                |
| <b>Fuel Oil #1</b>            | 9                                  | 18,472,779                            | 1,358                                                 |
| <b>Fuel Oil #2</b>            | 245                                | 548,514,264                           | 40,705                                                |
| <b>Fuel Oil #4</b>            | 11                                 | 22,195,752                            | 1,671                                                 |
| <b>Fuel Oil 5 &amp; 6</b>     | 2                                  | 5,830,140                             | 439                                                   |
| <b>Diesel</b>                 | 149                                | 63,162,863                            | 4,687                                                 |
| <b>Propane</b>                | 109                                | 173,138,982                           | 11,124                                                |

|                          |                                                                            |                 |            |
|--------------------------|----------------------------------------------------------------------------|-----------------|------------|
| <b>Wood Use</b>          | 2                                                                          | 181,564,439     | 17,031     |
| <b>Onsite Renewables</b> | 252                                                                        | 259,708,413     |            |
| <b>Total</b>             | Most buildings use at least two fuel types – total is not a building count | 747,480,347,254 | 41,004,693 |

**Table 2: Energy Usage and GHG Emissions by Building Type**

| <b>Building Type</b>                 | <b>Number of Buildings</b> | <b>Total Annual Energy Usage Reported (kBtu)</b> | <b>Total Annual GHG Emissions Reported (MTCO<sub>2</sub>E)</b> |
|--------------------------------------|----------------------------|--------------------------------------------------|----------------------------------------------------------------|
| <b>Banking/financial services</b>    | 72                         | 186,559,775                                      | 10,927                                                         |
| <b>Education</b>                     | 3,286                      | 21,432,639,529                                   | 1,346,289                                                      |
| <b>Entertainment/public assembly</b> | 883                        | 959,602,256                                      | 54,616                                                         |
| <b>Food sales and service</b>        | 143                        | 158,093,651                                      | 8,773                                                          |
| <b>Healthcare</b>                    | 722                        | 8,782,190,412                                    | 536,764                                                        |
| <b>Lodging/residential</b>           | 8,960                      | 650,871,175,181                                  | 35,383,292                                                     |
| <b>Manufacturing/industrial</b>      | 2,512                      | 7,602,701,290                                    | 430,165                                                        |
| <b>Mixed use</b>                     | 320                        | 861,609,637                                      | 49,222                                                         |
| <b>Office</b>                        | 3,114                      | 8,302,247,612                                    | 475,085                                                        |
| <b>Other</b>                         | 5,916                      | 6,375,619,034                                    | 373,963                                                        |
| <b>Parking</b>                       | 153                        | 228,679,206                                      | 13,319                                                         |
| <b>Public services</b>               | 773                        | 1,173,856,970                                    | 66,647                                                         |
| <b>Religious worship</b>             | 597                        | 200,449,707                                      | 11,189                                                         |
| <b>Retail</b>                        | 2,249                      | 4,437,880,932                                    | 258,269                                                        |
| <b>Services</b>                      | 304                        | 104,368,337                                      | 6,012                                                          |
| <b>Technology/science</b>            | 543                        | 8,719,708,079                                    | 529,712                                                        |
| <b>Utility</b>                       | 126                        | 25,313,376,389                                   | 1,352,205                                                      |
| <b>Warehouse/storage</b>             | 2,318                      | 1,769,589,257                                    | 98,244                                                         |
| <b>Total</b>                         | 32,991                     | 747,480,347,254                                  | 41,004,693                                                     |

## Collecting Data from Partners

Consistent with the statute and associated regulation, DOER relies primarily on utilities to report these data. DOER and the investor-owned utilities (3 electric companies and 5 gas companies) continue to scrub data and seek opportunities for the streamlining of data sharing. DOER anticipates that with each year of the program, the quality, completeness, and ease of reporting will accelerate. Moreover, DOER continues to work with Municipal Light Plant communities to find the best way to collect and report on the data for buildings in their communities.

## Next Steps

Consistent with building energy reporting programs across the country, this inaugural year is simply the starting point. As program mechanics improve and reporting parties become more familiar with the program, DOER expects data to improve, participation to increase, and meaningful trends in fuel usage to emerge. To that end, DOER intends to make available more information in the coming months detailing the program design, challenges encountered, and plans for future improvements.

Sincerely,

A handwritten signature in dark ink, appearing to read "Elizabeth Mahony", is enclosed within a thin black rectangular border.

Elizabeth Mahony  
Commissioner