

Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
DEPARTMENT OF ENERGY RESOURCES

**LARGE BUILDING ENERGY REPORTING PROGRAM
(225 CMR 27.00)**

GUIDELINE

DRAFT Gross Floor Area (GFA) Guideline

Draft issued for public comment: March 31, 2025

Purpose

This Guideline provides Large Building Energy Reporting (LBER) stakeholders with guidance about how the Massachusetts Department of Energy Resources (DOER) will define and calculate Gross Floor Area (GFA) for the purposes of 225 CMR 27.00. All capitalized terms in this Guideline are either proper nouns or defined in 225 CMR 27.02.

GFA under LBER

G.L. c. 25A, § 20 and 225 CMR 27.00 requires the reporting of Energy Usage information for buildings in the Commonwealth with a Gross Floor Area equal to or greater than 20,000 square feet. Gross Floor Area is defined under 225 CMR 27.02 as follows:

Gross Floor Area. The total floor area contained within a Building measured to the external face of the external walls.

Default Building GFA

The default GFA value for a Building on the Covered Buildings List is determined using publicly available data (e.g., municipal property records). If a Building Owner believes the GFA value for their Building is incorrect, the Building Owner may submit a “Recalculate my Gross Floor Area” request at the [LBER Helpdesk](#) (Helpdesk). The Building Owner should include any applicable documentation. [Please see attached questions to provide input about applicable documentation]

Changing GFA from the Default Value

If a Building Owner would like their Building’s GFA under 225 CMR 27.00 to better align with Energy Star Portfolio Manager’s (ESPM) [Property Gross Floor Area Metrics standards](#), the Owner may request that their Building’s GFA be calculated to align with the national standard.

DOER notes that ESPM was designed as a tool for Building Owners to track their assets’ performance and LBER is a policy which facilitates the public disclosure of Building Energy Usage. As such, DOER recognizes that there may be Energy Usage associated with a Building that an owner may want to track in ESPM but that should not be included in a Building’s Energy Usage (e.g., external athletic fields with no associated Building).

To request a change in the default GFA to better align with guidance from ESPM, contact the [Helpdesk](#) and submit a “Update Covered Buildings List Information” form.

Measuring Gross Floor Area (GFA)

DOER utilized ESPM's guidance to determine what should be included and excluded in calculating GFA.¹ DOER may update this Guideline to reflect future updates to ESPM guidance.

- ***“Single buildings” and “campuses of buildings”*** measure the GFA between the outside surface of the exterior walls of the building(s) (it is also acceptable to measure from the inside perimeter of the exterior walls if that is more readily available). This includes all areas inside the building(s) including supporting areas. GFA is not the same as rentable space but rather includes all area inside the building(s).

- **Include in GFA:** lobbies, tenant spaces, common areas, meeting rooms, break rooms, atria (count the base level only), restrooms, elevator shafts, stairwells, mechanical equipment areas, basements, storage rooms, and parking structures.
- **Do not include in GFA:** exterior spaces, balconies, patios, exterior loading docks, driveways, covered walkways, outdoor play courts (tennis, basketball, etc.), exterior surface parking, the interstitial plenum space between floors (which house pipes and ventilation), crawl spaces.
- **Questions about calculating GFA can be directed to DOER:** In general, include spaces within the exterior walls and do not include spaces outside exterior walls. If a Building Owner needs clarification about whether a space in a Covered Building counts toward its GFA, submit a “General Inquiry” ticket in the [Helpdesk](#) for a determination.

With written approval from DOER, you may exclude from your GFA calculation the GFA of certain distinct activity or activities that meet following criteria:

- The activity's energy use patterns are significantly different than those of the rest of the Building. (ex: A cell phone tower on a Building or a parking area with significant electric vehicle charging infrastructure)
- The activity does not use significant energy (e.g., an un-lit or heated outdoor agricultural retail area)

To obtain approval from DOER, you must submit a ticket to the [Helpdesk](#) explaining which of these criteria your Building meets and provide any applicable supporting documentation.

¹ Energy Star Portfolio Manager, *Glossary*, <https://portfoliomanager.energystar.gov/pm/glossary> (last visited March 25, 2025).

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Questions issued for public comment: March 31, 2025

The Massachusetts Department of Energy Resources' (DOER) request for public comment on determining Gross Floor Area in Building Energy Reporting program rules, pursuant to 225 CMR 27.02.

Currently, the definition of Gross Floor area in the regulations is:

Gross Floor Area. The total floor area contained within a Building measured to the external face of the external walls. Further clarification on the definition of Gross Floor Area may be established by the Department in the Department's Gross Floor Area Guideline.

DOER has released a draft Guideline further clarifying how to calculate Gross Floor Area together with this document. In addition to feedback on the draft, DOER seeks public feedback on commonly used documentation to demonstrate the area of a building. Please provide an answer to the questions:

What are common ways building owners can prove floor area of their building? Which methods of proving floor area are more reliable or easier to produce?

Please submit any feedback to DOER by April 23rd at 5pm EDT. You can submit feedback via email to DOER.BER@mass.gov with the subject line "**Gross Floor Area Guideline Feedback**" or via mail to Massachusetts Department of Energy Resources c/o LBER, 100 Cambridge St. 9th Floor, Boston, MA, 02114. Please be advised that there may be delays in receiving written comments via the mail.