

BEPS Laboratory Focus Group

Meeting #1 Summary

Meeting details: October 2, 2026 on Zoom from 2-4PM

Present: Brad Rock, Geoffrey Glass, Heather Burpee, John Kearns, Julie Scrivner, Melissa Hutton, Melvin Knox, Nick Tran, Steve Matthes, Travis Wong.

City of Seattle BEPS and Facilitation Staff: Nicole Ballinger and Samuel Manning (Office of Sustainability & Environment - OSE), Santiago Rodriguez-Anderson, Erin Wenger (Lattice Energy), Kirstin Pulles and Lisa Hasan (Unrooz Solutions)

Meeting slides are available at: [BEPS Rulemaking web page](#)

Agenda:

Topic	Time
Welcome and introductions	15 mins
Greenhouse Gas Intensity Targets (GHGIs) for laboratories - Existing provisional targets and alternative pathways for Laboratories - New calculation methodologies and GHGIs for Laboratories - Questions	45 mins
Break	5 mins
Group Discussion - Which existing flexibility options are most relevant for laboratories? - Are there unique circumstances, not addressed by the flexibility options?	45 mins
Wrap-up	10 mins

Organized by:



Seattle Office of
Sustainability &
Environment

Facilitated by:



Technical analysis by:



**Lattice
Energy**

Group Discussion Summary

Greenhouse Gas Intensity Targets (GHGITs) for laboratories

Topic: OSE shared details about the provisional 2031-2035 GHGITs for laboratories and introduced potential methodologies developed by Lattice Energy which could be used to adjust the provisional GHGITs in the current rulemaking process. Options included different approaches to outlier data within the data set, and a choice between 2019 and 2024 energy use data from Seattle laboratories. View the slides for further details.

Discussion:

- Attendees asked for clarifications about several deductions and exemptions, including emergency-back up heat, electric vehicle charging equipment, and district steam. Further details about these can be found in the [Director's Rule](#).
- An attendee asked about the significance of October 1, 2027. OSE shared that October 1, 2027 deadline is for buildings over 90,000 sq. ft to have their benchmarking data reviewed by a qualified person and to submit their first greenhouse gas report.
- There were questions about end-use deduction workbooks for lab equipment. OSE clarified that given the unique nature and limited available data on high intensity process equipment and emergency back-up power, these deductions would currently require sub-metering, though they are considering if and how engineering calculations could be used.
- Attendees wondered where the buildings from the GHGIT calculations were located, and how many buildings were included. All buildings are in Seattle. In the 2019 dataset there were 15 buildings and in the 2024 dataset there were 24 buildings used in the calculation that were primarily laboratory use. Fully electric labs were excluded. The buildings' energy use data is also weather normalized.
- An attendee wanted to understand why the GHGI targets plan for a linear reduction. OSE responded that a linear reduction path provides a clear planning pathway for building owners. The goal is to provide a consistent and clear approach for all buildings, with flexible options for those that need it.
- One attendee shared that the provisional targets for 2031-2035 look reasonable, though the further targets look more challenging.
- When asked why emissions seem to be trending down in laboratories, one attendee shared that occupancy tends to be lower in most buildings post-COVID. Another attendee wondered whether the shift was from electrification vs energy efficiency. Lattice explained that because the benchmarking data is an annual snapshot, it's challenging to separate the two effects.

Which existing flexibility options are most relevant for laboratories?

Topic: The group reviewed the existing flexibility options within BEPS, including end-use deductions (emissions from certain equipment can be deducted from a building's emissions calculations within certain compliance periods), portfolio level compliance (aggregate GHGI targets for portfolios, campuses and connected buildings), extensions (in specific circumstances), alternate compliance options (alternate compliance payments in the 2031-2035 compliance cycle, alternate GHGIT), and custom decarbonization plans (which allows up to 9 extra years for compliance and is available for specific circumstances).

Discussion:

- The group was polled to ask which compliance options they believe are most relevant to laboratories. The top choice was custom decarbonization plans, with end-use deductions and portfolio level compliance in second place receiving similar levels of support. Alternative compliance payments and extensions received few votes.
- One attendee shared that as a non-profit, they rely on incentives for making their planning decisions. The emissions deductions option is helpful for achieving compliance while they work towards identifying opportunities for reductions. Incentives for demand response could also be helpful.
- Another attendee shared that within a diverse portfolio, each building will have a unique decarbonization approach. The decarbonization plan provides the most flexible path for achieving the target while maintaining the buildings' activities.
- The portfolio compliance approach is helpful for one attendee with multiple buildings, to be able to approach decarbonization through a comprehensive planning process across their buildings.
- With the existing flexibility, one attendee shared that extensions don't feel necessary at this time for their buildings, but they support them being available for those who need it. Another attendee agreed that the provisional 2031-2035 targets feel attainable.

Are there unique circumstances, not addressed by the flexibility options?

Topic: OSE asked the group to share about situations or circumstances unique to laboratories which should be considered when deciding on the approach to laboratory GHGI targets in the latest round of rulemaking.

- One attendee shared that many of their buildings will be able to meet the initial targets at a reasonable cost, but the last steps to achieve net zero will be challenging. However, the existing flexibility provides good options for the challenges that they may face in their final decarbonization push.
- Another attendee wanted to know whether Seattle City Light is prepared to provide the electrical capacity needed to support electrification broadly. A representative

from City Light shared after years of relatively flat electricity demand, the utility expects steady load growth as more residents and businesses adopt electric vehicles and transition from fossil fuel-based heating and cooling to electric alternatives from personal choice or mandates. City Light's current forecast shows additional capacity is needed to meet the anticipated increase. To reliably meet future demand, City Light will need to invest in significant new clean energy resources — including wind, solar, battery storage, and firm capacity — while also expanding transmission infrastructure and deploying demand-side solutions. For individual building distribution, City Light explained that it will depend on the specific building. Attendees are encouraged to map out their own expected needs and use the early design guidance program to talk to engineers and determine the amount of work that will be needed. Decarbonization plans are available if there are significant challenges from electrical upgrades.

- There was a request for more information about the low emissions pathway. OSE explained that participants can apply for a low emissions pathway in which the final target is a 90% reduction from the building's baseline emissions and can request a custom target if 90% is not appropriate.
- An attendee shared that labs may be required to maintain dual fuel back-ups for critical services, which are difficult to safely remove.
- One attendee pointed out that sub-metering end-use deductions can be quite challenging, and complex to report. As an example, separating fuel and energy use for equipment that is used for two different uses, if only one of the uses is exempt, is very challenging. Attendees requested alternatives to sub-metering. Another attendee asked whether lab bench gas is a challenge, and others shared that it is used minimally these days. However, where it is used, it is challenging to replace.
- Some attendees are noticing efforts in the market to automate processes in hospital/diagnostic laboratories, which is increasing electrical load (though it may not impact fossil fuel use).

What other flexibility options (if any) are needed to help laboratories meet the 2031-2035 target? 2036-2040? Net zero by 2045?

Topic: Attendees were asked to brainstorm ideas for further flexibility options that they may require for compliance in the first and future cycles.

- One attendee expects that some types of labs, particularly laboratories which are engaged in manufacturing, will be generating much higher heat and plug loads than most labs today. An Unrooz representative shared that some laboratories are classified as manufacturing in some jurisdictions. OSE requested further information and examples of this type of laboratory once more information is available.