WASHINGTON, D.C. · D.C. CODE § 8-1772.21 & 20 DCMR CH. 35

Washington, D.C. BEPS Cycle 1 & 2027 Cycle 2 Guide

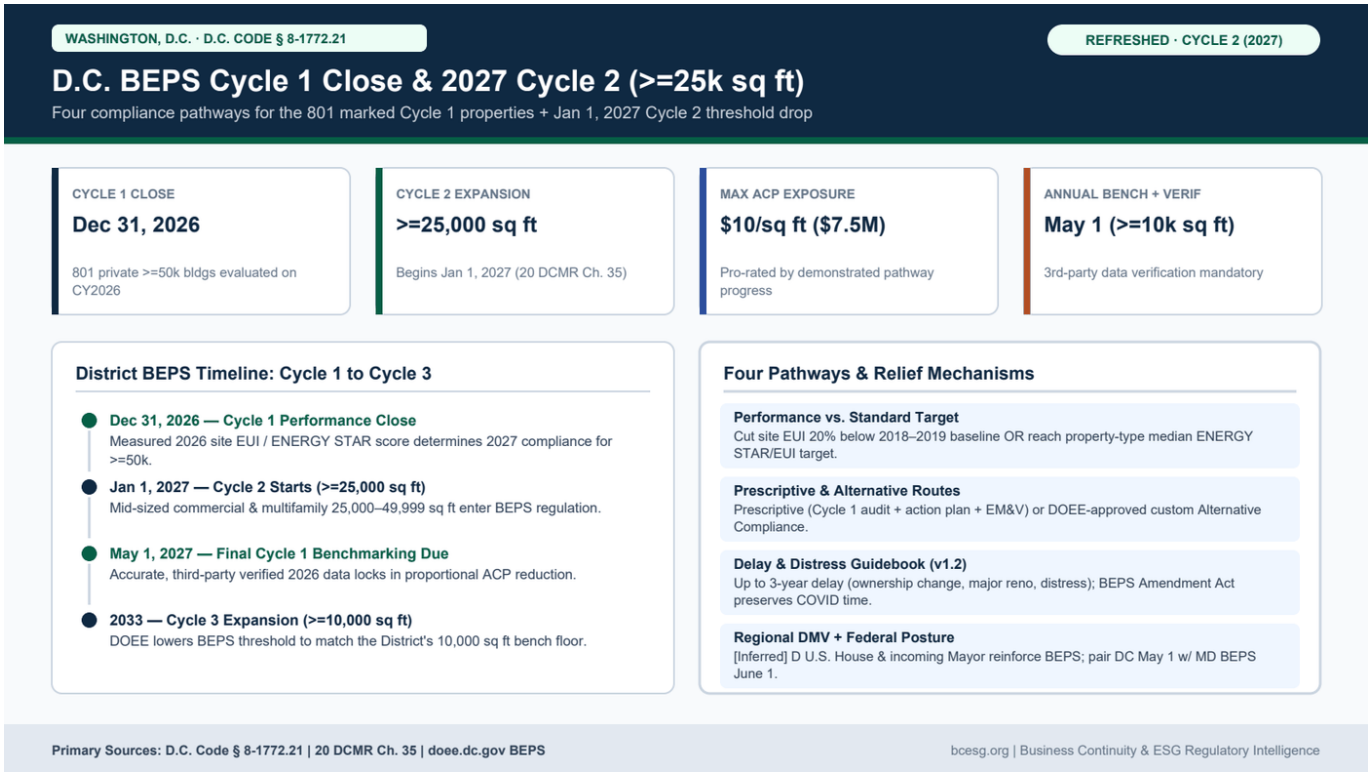
Four Cycle 1 pathways for 801 marked buildings + Jan 1, 2027 >=25,000 sq ft Cycle 2 expansion

1. Statutory Scope, Thresholds & Key Dates

Cycle / Requirement	Covered Building Floor	Key Dates & Statutory Caps
Cycle 1 (Active Close)	Private >=50,000 sq ft (DC >=10k)	Measured through Dec 31, 2026; final CY2026 bench May 1, 2027
Cycle 2 Expansion	Private >=25,000 sq ft (adds 25k–49k)	Starts Jan 1, 2027 under D.C. Code § 8-1772.21 / 20 DCMR Ch. 35
Cycle 3 Expansion	Private >=10,000 sq ft	Scheduled 2033 alignment with District bench threshold
Annual Bench & Verif	All buildings >=10,000 sq ft	Annual May 1 Portfolio Manager report + 3rd-party data verification
Maximum ACP Penalty	Non-compliant GFA	Up to $10/sq ft capped at $7.5M (prorated by verified progress)

2. Operational Requirements & Enforcement

- **Cycle 1 Ends Dec 31, 2026:** CY2026 site EUI and Prescriptive EM&V records determine whether 801 marked >=50k sq ft buildings pay scaled ACPs in 2027.
- **Cycle 2 Drops to 25,000 sq ft Jan 1, 2027:** Mid-sized private office, retail, and multifamily properties enter BEPS regulation immediately after Cycle 1.
- **Record Integrity Protects Cash:** Incomplete or late May 1 verified benchmarking forfeits proportional ACP reductions under D.C. rules.



WASHINGTON, D.C. · D.C. CODE § 8-1772.21 & 20 DCMR CH. 35 · PAGE 2 CHECKLIST

D.C. BEPS Cycle 1 Close & Cycle 2 Readiness Checklist

Step-by-step workflow from utility data verification through filing & compliance proof

Step	Owner / Team	Auditable Deliverable
1. Open Data Status	Asset Mgmt	Check building standing in DOEE Building Energy Performance disclosure (Meets / Pathway / Missing).
2. Close Cycle 1 Docs	Energy / PE	Finalize Prescriptive Phase 3–4 EM&V reports or CY2026 meter tracking before Dec 31, 2026.
3. Prep 25k Cycle 2	Portfolio Lead	Flag all DC properties 25,000–49,999 sq ft entering Cycle 2 standards on Jan 1, 2027.
4. May 1 Verified File	Compliance Lead	Submit third-party verified CY2026 benchmarking by May 1, 2027 to preserve proportional ACP relief.

Key Questions & Edge-Case Rules

- **When does D.C. BEPS Cycle 2 begin and what building sizes does it cover?** Cycle 2 begins January 1, 2027 and expands mandatory BEPS compliance to privately owned buildings of 25,000 gross sq ft or larger (down from Cycle 1's 50,000 sq ft threshold).
- **How is the D.C. BEPS Alternative Compliance Payment calculated if my building only falls slightly short?** The maximum penalty is $10 per sq ft of gross floor area (capped at $7,500,000 per building), but DOEE scales the actual payment down in proportion to verified progress achieved toward the building's pathway target—provided final CY2026 benchmarking data is accurate, complete, and timely.
- **What threshold triggers annual benchmarking and third-party verification in Washington, D.C.?** Annual May 1 benchmarking and periodic third-party data verification apply to covered private and District-owned buildings of 10,000 gross sq ft or larger.
- **Can my D.C. building still get a delay for financial distress or renovation?** Yes. Under DOEE's Compliance and Enforcement Guidebook v1.2 and the BEPS Amendment Act of 2024, qualifying owners can apply for up to a 3-year compliance delay for ownership changes, major renovations, pending demolition, or verified financial distress without losing prior COVID timeline relief.

Primary Sources & Statutory Citations

- D.C. Department of Energy & Environment — Building Energy Performance Standards (BEPS)
- D.C. Council Code — § 8-1772.21 Building Energy Performance Standards
- Maryland BEPS (COMAR 26.28 & HB 49) DMV Comparison — BC ESG
- NYC Local Law 97 Enforcement & Penalties Guide — BC ESG

Canonical Guide: https://bcesg.org/dc-beps-building-missed-standard-pathways/

Informational Reference Only: Published by BC ESG (Tygart Media). Summarizes statutory and regulatory rules from cited primary sources; not legal, accounting, tax, or licensed engineering advice.