NEW YORK CITY · NYC ADMIN. CODE §§ 28-308 TO 28-311

NYC LL84, LL87, LL88 & LL33 Stack

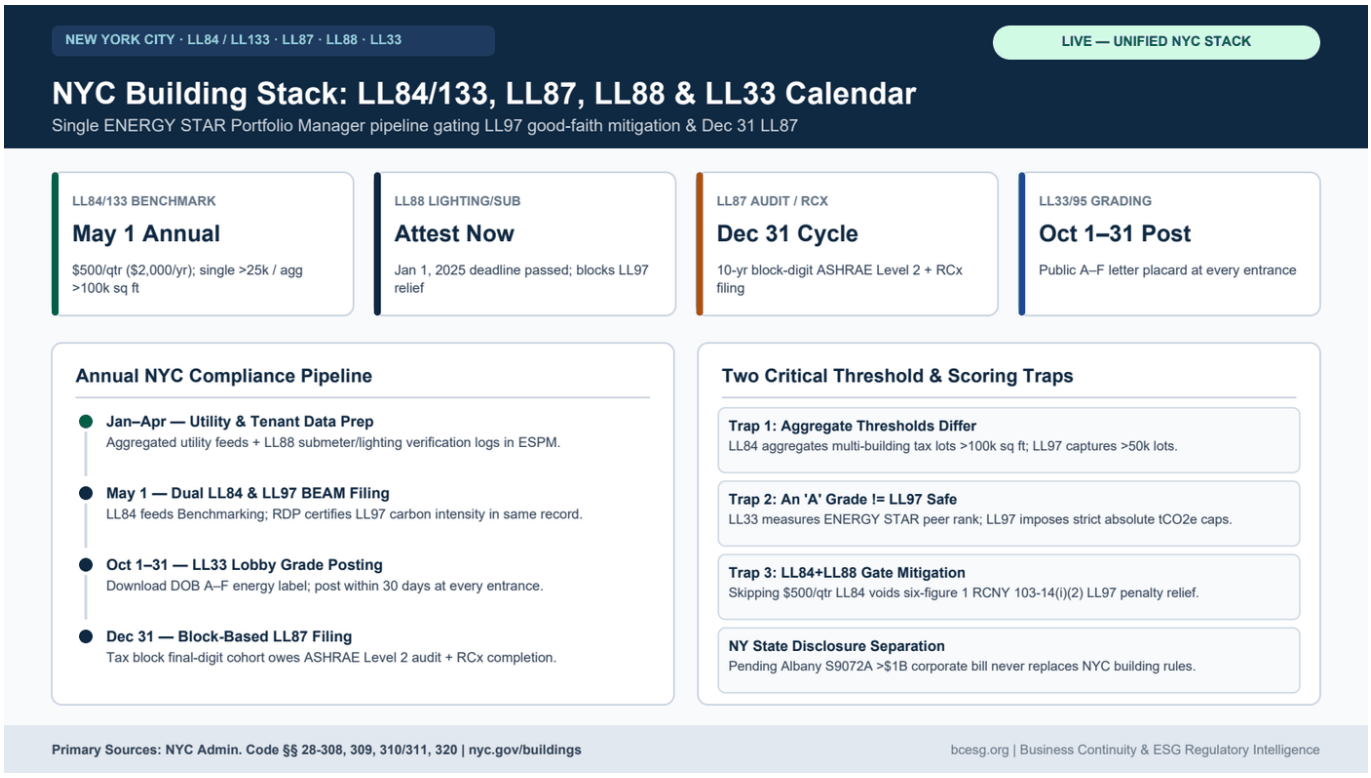
Portfolio Manager benchmarking, letter grades, LED/submetering & 10-year RCx rotation

1. Statutory Scope, Thresholds & Key Dates

Local Law & Citation	Threshold & Coverage	Deadline / Cadence	Statutory Violation Exposure
LL84 / LL133 (§ 28-309)	Single bldgs >=25k sf; multi-bldg tax lots >=100k sf	Annual May 1 (ENERGY STAR PM)	$500/quarter ($2,000/yr cap) + triggers F grade
LL33 / LL95 (§ 28-309.12)	Covered LL84 buildings >=25k sf	Download Oct 1; post by Oct 31	$1,250 annual non-posting DOB fine
LL88 (§§ 28-310, 28-311)	Nonres >25k sf lighting; tenant spaces >5k sf submeters	Compliance active Jan 1, 2025+	$1,500 initial + per-submeter fines + blocks LL97 relief
LL87 (§ 28-308)	Buildings >50k sf (or multi-bldg lots >100k sf)	Dec 31 on 10-yr Tax Block last digit	$3,000 year 1; $5,000 each subsequent yr late

2. Operational Requirements & Enforcement

- **May 1 Anchors Everything:** LL84 benchmarking populates both your October LL33 lobby grade and the baseline required for LL97 penalty mitigation.
- **LL88 Active Since 2025:** Non-residential LED upgrades and >5,000 sq ft tenant submetering attestations are mandatory preconditions for DOB Good-Faith relief.
- **Block-Digit LL87 Cycle:** Check the last digit of your NYC Tax Block number early — December 31 EER audits require months of ASHRAE Level II field work.



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NYC Annual Sequencing & DOB Penalty Avoidance Checklist

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

Step	Owner / Team	Auditable Deliverable
1. Utility Meter Audit	Property Manager	Reconcile ConEd/National Grid whole-building CSV accounts in Portfolio Manager.
2. May 1 Joint Window	Compliance / RDP	File LL84 benchmarking alongside LL88 and LL97 filings before May 1.
3. Oct 31 Lobby Grade	Building Operations	Print DOB NOW Energy Efficiency Label and post in public lobby + photo proof.
4. Block-Digit LL87 Check	Engineering Lead	Verify NYC Tax Block final digit against upcoming Dec 31 EER audit cohort.

Key Questions & Edge-Case Rules

- **Which NYC buildings owe LL84 benchmarking vs. LL87 energy audits?** LL84/133 benchmarking applies annually starting at >=25,000 sq ft, whereas LL87 10-year Energy Efficiency Reports (audits and retro-commissioning) apply at >50,000 sq ft (or multi-building lots >100,000 sq ft) on a Tax Block last-digit schedule.
- **What happens if I miss LL84 benchmarking before October LL33 grade issuance?** NYC DOB issues an automatic 'F' Energy Efficiency Grade in October, triggers $500 quarterly benchmarking fines, and renders your building ineligible for 1 RCNY § 103-14(i)(2) LL97 penalty mitigation.
- **How is my Local Law 87 due date determined?** Your 10-year LL87 EER deadline falls on December 31 of the calendar year whose last digit matches the final digit of your NYC Tax Block number (e.g., Tax Block 1206 is due December 31, 2026).

Primary Sources & Statutory Citations

- NYC DOB — Benchmarking (LL84 / LL133 / LL33)
- NYC DOB — Sustainability, Energy Audits & Submetering (LL87 / LL88)

Canonical Guide: https://bcesg.org/ll84-ll88-ll97-nyc-compliance-stack/

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