MINNESOTA · MINN. STAT. § 216C.331

Minnesota Large Building Benchmarking Program

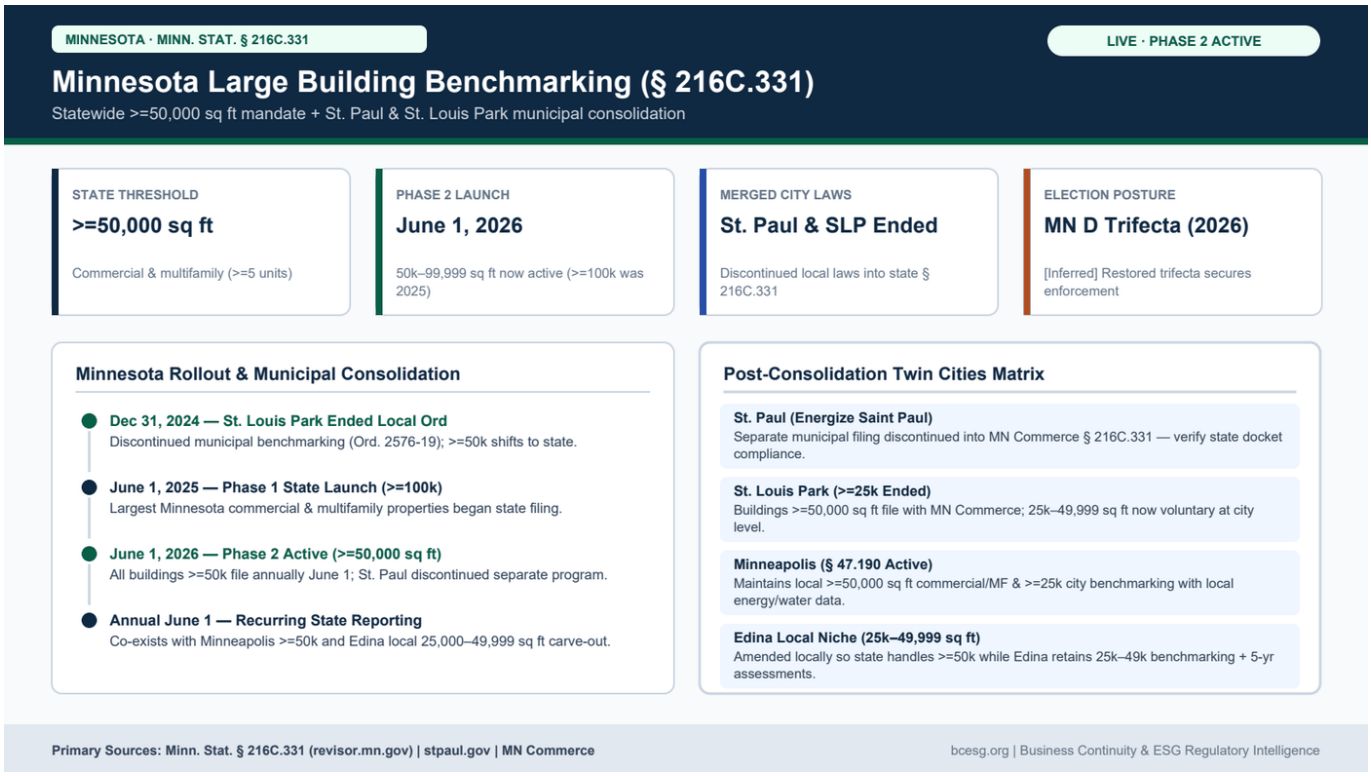
Statewide >=50,000 sq ft Phase 2 reporting + St. Paul & St. Louis Park transition matrix

1. Statutory Scope, Thresholds & Key Dates

Jurisdiction / Layer	Current Floor & Law	Active 2026–2027 Status
Minnesota State (§ 216C.331)	Commercial & MF (5+ units) >=50,000 sq ft	ACTIVE NOW — June 1 annual to MN Commerce
St. Paul, MN	Former >=50k Energize Saint Paul	DISCONTINUED locally — file via MN § 216C.331
St. Louis Park, MN	Former >=25k Ord. 2576-19	DISCONTINUED Dec 31, 2024 — >=50k files with state
Edina, MN	Amended Efficient Buildings Ord.	Active locally ONLY for 25,000–49,999 sq ft (June 1)
Minneapolis, MN	Code Ch. 47 § 47.190 (>=50k)	Active municipal energy + water filing due June 1

2. Operational Requirements & Enforcement

- **June 1, 2026 Phase 2 Trigger:** Minnesota's statewide threshold dropped from 100k to >=50,000 sq ft across commercial and 5+ unit multifamily properties.
- **Do Not Double-Count St. Paul or SLP:** St. Paul and St. Louis Park ended standalone local benchmarking ordinances in favor of § 216C.331.
- **Edina Niche & Mpls Dual:** Edina kept 25,000–49,999 sq ft locally, while Minneapolis enforces June 1 energy and water filings alongside state compliance.



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Minnesota & Twin Cities Portfolio Checklist

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

Step	Owner / Team	Auditable Deliverable
1. Jurisdiction Map	Asset Mgmt	Tag each MN asset >=25k sq ft as State-Only (incl. St. Paul / >=50k SLP), Dual Mpls+State, or Edina 25k-49k.
2. Utility Connect	Property Ops	Connect Xcel Energy / CenterPoint automated whole-building Portfolio Manager feeds before April.
3. File by June 1	Compliance Lead	Submit state § 216C.331 (and Minneapolis/Edina where applicable) by June 1 annually.
4. 2027 Policy Watch	ESG Lead	Track restored MN trifecta committee activity for potential corporate disclosure or BPS bills.

Key Questions & Edge-Case Rules

- **Do buildings in St. Paul or St. Louis Park still file separate city benchmarking reports?** No. Both St. Paul (Energize Saint Paul) and St. Louis Park (effective end of 2024) discontinued their separate municipal benchmarking mandates, consolidating >=50,000 sq ft properties into Minnesota's statewide § 216C.331 program.
- **What changed in Edina after Minnesota passed § 216C.331?** Edina amended its Efficient Buildings Ordinance so buildings >=50,000 sq ft report to the state while Edina retains local June 1 energy and water benchmarking plus 5-year energy assessments specifically for 25,000–49,999 sq ft buildings.
- **Does Minnesota § 216C.331 cover residential apartments?** Yes. Multifamily residential buildings with five or more units and >=50,000 gross sq ft are covered alongside commercial properties.

Primary Sources & Statutory Citations

- Minnesota Legislature — Minn. Stat. § 216C.331 Large Building Energy Benchmarking
- City of St. Paul — Energize Saint Paul Discontinuation & State Transition Notice
- New Jersey Clean Energy Act Benchmarking Guide — BC ESG

Canonical Guide: https://bcesg.org/minnesota-large-building-benchmarking-216c-331-guide/

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