



**March 22, 2023**

Chair Frentz and Members of the Energy, Utilities, Environment, and Climate Committee:

The Minnesota Chamber, which represents over 6,300 businesses with over 500,000 employees, believes in the triple goal of affordable, reliable, and cleaner energy. We support our members' interests and efforts to advance sustainability, and we work hard to help them reduce energy consumption, divert waste, and minimize environmental impact.

We would like to raise the following concerns with SF 2295 (Mitchell):

- The bill would create a new statewide mandate that building owners enter data into a public energy benchmarking database. Minnesota would become only the seventh state in the country to enact a benchmarking requirement while no other state in the region has such a mandate.
- The bill would make significant amounts of commercial building data available to the public including total energy use, energy use per square foot of total floor area, annual greenhouse gas emissions, and an energy performance score. Decisions about third-party access to utility customer data should remain with the customer. Opportunities for a customer to release its utility data already exist and additional pathways to this data raise concerns about trade secrets, international competitiveness, anti-trust violations, and security of the data after release.

Minnesota is already a highly regulated and expensive state in which to conduct business. This proposal would add additional costs and burdens when building owners already have other financial and environmental incentives to reduce their own energy use.

Sincerely,

Brian Cook  
Director, Energy and Elections Policy