

Jenna Tipaldi
Office of Sustainability
910 Dublin Road
Columbus, OH 43215

January 13, 2020

Dear Ms. Tipaldi,

The Columbus Apartment Association (CAA) is a non-profit trade association that represents the interests of owners/managers of over 126,000 rental housing units in Columbus and Franklin County.

The CAA opposes the mandatory requirement to supply energy and water consumption information to the City of Columbus. The reporting requirements add additional administrative costs and burden to owners of rental property without any significant public benefit.

Virtually all apartment residents pay utilities directly, the apartments are individually metered, and residents are directly billed. The owner/manager of the apartments have very little control of energy and water consumption. Control of energy and water consumption is by the apartment resident, not the owner.

The assumption that benchmarking energy and water usage in rental housing will result in lower energy and water consumption is incorrect.

Unless there are financial incentives provided an owner is unlikely to make capital expenditures to reduce energy consumption by the residents. If an incentive program was in place, then there would be a motivation for the owner to benchmark and make capital expenditures.

Apartments tend to have smaller square footage and were built with equal or better energy efficiency than single family homes. Potential energy conservation is greater in single family homes than in apartments. The ordinance does not include single family houses, even though single family houses consume more energy and water than apartments.

Housing affordability is a growing and real concern, adding additional regulatory burden to apartment owners will result in less affordability not more.

CAA strongly urges removing a mandatory reporting requirement for all apartments. Please feel free to contact me if you have any questions.

Sincerely,



Laura Swanson
Executive Director