

City and County of Denver

**Energize Denver
Benchmarking and Energy
Performance Requirements**

Buildings 25,000 Square Feet and Larger

**Third-Party Data Verification
Process Guide**

Updated February 2026

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[Performance Requirements Lookup Tool](#)

Contents

1.	INTRODUCTION.....	3
2.	DATA VERIFIER QUALIFICATIONS	3
3.	DATA VERIFICATION TIMING	3
3.1	Target Evaluation.....	3
3.2	Target Adjustment	4
4.	DATA VERIFICATION PROCESS	5
4.1	Building Owner Connects with the Data Verifier in ESPM.....	5
4.2	Building Owner Shares the Property with Data Verifier in ESPM.....	6
4.3	Building Owner Supplies Information to Support Verification	9
4.4	Data Verifier Confirms Benchmarking Report	9
4.5	Data Verifier Generates the Data Verification Checklist.....	9
4.6	Data Verifier Completes the Data Verification Checklist.....	11
4.6.1	Review of Whole Property Characteristics.....	11
4.6.2	Review of Property Use Details	11
4.6.3	Review of Energy Consumption.....	12
4.6.4	Complete and Sign the Data Verification Checklist	12
4.7	If Differences are Found Between Building Data and ESPM	13
4.7.1	Data Verifier or Building Owner Corrects ESPM	13
4.7.2	Data Verifier Generates and Completes New Data Verification Checklist	14
4.7.3	Data Verifier or Building Owner Resubmits Updated Benchmarking Submission	14
4.7.4	Data Verifier or Building Owner Submits Data Verification Checklist to CASR.....	14
4.8	Submit the Signed Checklist to CASR	14

1. INTRODUCTION

Benchmarking correctly and with detail is the foundation for building performance standards. In order to measure performance with the energy efficiency policy, the City of Denver's Office of Climate Action, Sustainability and Resiliency (CASR) must receive complete and accurate benchmarking reports that include correct square footage, breakdown of space use types, and energy use data.

Third-party data verification of a benchmarking report is required twice: once before the end of the 2026 benchmarking reporting year and once for the measurement period of the final target (usually 2032 or another year if a timeline extension has been approved). To confirm that buildings are benchmarking with sufficient detail to receive an accurate energy efficiency target, CASR requires third-party data verification of one benchmarking submission by the end of the 2026 reporting year. Third-party data verification must also accompany a Data Verification Checklist Requirement Form. If the building is already ENERGY STAR® Certified for the calendar year requiring data verification, if the time frame overlaps by six months or more, then the submission can be the verified application.

A data verifier can also assist the building owner with adjusting their benchmarking report, so it is normalized for building performance targets (see Technical Guidance Section 4.2) or to satisfy the need for data verification of a target adjustment application (see Technical Guidance Section 5.4). The data verifier would make these adjustments to the building's benchmarking report before signing off on the Data Verification Checklist.

2. DATA VERIFIER QUALIFICATIONS

The third-party individual verifying the data (Data Verifier) must be a third-party with one of the following licenses, credentials, or certifications, and are in good standing with the authorizing organization:

- Professional Engineer (PE) issued within the United States
- Registered Architect (RA) issued within the United States
- Certified Energy Manager (CEM from AEE)
- Building Energy Assessment Professional (BEAP from ASHRAE)
- Energy Management Professional (EMP from EMA)
- Any other additional Data Verifier license or training program credentials recognized by CASR and posted to its website

A data verifier can NOT be the building owner or an employee of the building owner. A data verifier can perform third-party data verification whether they previously completed the benchmarking report or not.

3. DATA VERIFICATION TIMING

Third-party data verification is required to be submitted with the benchmarking reports for specific building performance target years, as well as with Target Adjustment applications.

3.1 Target Evaluation

Third-party data verification of a benchmarking report is required twice: once before the end of the 2026 benchmarking reporting year and once for the measurement period of the final target (usually 2032 or another year if a timeline extension has been approved).

To confirm that buildings are benchmarking with sufficient detail to receive an accurate final target, CASR requires third-party data verification of one benchmarking submission by June 1, 2026. Either:

- The 2024 calendar year benchmark report (submitted in 2025) must be verified OR

- The 2025 calendar year benchmark report (submitted in 2026) must be verified OR
- A building that has already performed third-party verification for an approved target adjustment has satisfied this requirement.

After completing this initial verification requirement, buildings will not be required to submit another third-party data verification until the calendar year benchmarking where the final target year measurement period occurs (ex. 2032 benchmarking data submitted in June 2033).

3.2 Target Adjustment

Third-party data verification is required for a target adjustment. The year for which the data is verified will depend on which reason the data verification is being completed. Table 1 summarizes the recommended calendar year of benchmarking data that needs to be verified based on the reasoning for the data verification.

TABLE 1: TARGET ADJUSTMENT TYPE AND VERIFICATION YEAR

Adjustment Type	Verification Year
Operating Hours	Most recent benchmarking report
Parking	Most recent benchmarking report
Heated Swimming Pool	Most recent benchmarking report
Data Center	Most recent benchmarking report
Building Type Classification Changes	Most recent benchmarking report
Changes due to renovation or new tenants	Most recent benchmarking report
Building Added or demolished square footage	Most recent benchmarking report
Gross Floor Area or Square Footage	Baseline year
Inaccurate Energy Data that affects the baseline	Baseline year

The Baseline Year may vary depending on the property’s records with CASR. Most buildings have the Baseline Year assigned as 2019 (measurement period = January 1 – December 31, 2019), but some may have a different Baseline Year assigned by CASR or may have an approved adjustment on record to change the Baseline Year. The verification year of “Most Recent” will be the calendar year of the most recent benchmarking report submitted to CASR. For example, if a Target Adjustment application is submitted for parking in 2025, the data verification included will need to have a measurement period of Jan 1 - Dec 31, 2024, to align with the 2024 calendar year benchmarking report submitted to CASR by June 1, 2025. If a target adjustment application is filed for more than one reason in the Application Type column above, the verification performed could be for the baseline year AND/OR the most recent year.

4. DATA VERIFICATION PROCESS

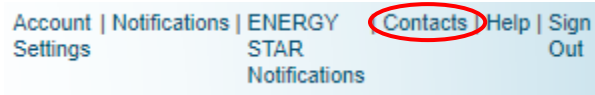
Data verification requires cooperation between the building owner and data verifier. Once the data verifier is hired, the first three steps involve the building owner sharing information with the data verifier, and the last three steps are completed by the data verifier

This section covers the step-by-step process:

1. Building owner connects with the Data Verifier in ENERGY STAR® Portfolio Manager (ESPM).
2. Building owner shares the property with Data Verifier in ESPM.
3. Building owner supplies information to support verification.
4. Data Verifier confirms benchmarking data.
5. Data Verifier generates the Data Verification Checklist.
6. Data Verifier completes the Data Verification Checklist.
7. If differences are found, Data Verifier or Building owner corrects ESPM.
8. If ESPM has been corrected, Data Verifier generates and completes new Data Verification Checklist. Data Verifier or Building owner resubmits corresponding year benchmarking if changes to ESPM were made. **The data in ESPM, the DVC submitted, and the corresponding data year's benchmarking report submitted to the city MUST match.**
9. Data Verifier or Building Owner submits Data Verification checklist to CASR (and notifies CASR of updated Benchmarking Submission if corrected).

4.1 Building Owner Connects with the Data Verifier in ESPM

In order for the data verification to be completed by the Data Verifier, whether in-person or remotely, the Data Verifier have access to the building's ENERGY STAR Portfolio Manager account, so they must be added as a contact. In ESPM, click on "Contacts" in the top right corner.



This will bring you to the My Contacts and Organizations page. On this page, click the "Add New Contacts/Connections" button.

My Contacts and Organizations

This is where you keep track of your contacts and/or organizations (i.e. people or companies associated with your properties such as Professional Engineers, Registered Architects, or others with whom you share information). You can add anyone as a contact, regardless of whether they have a Portfolio Manager account and you can share your properties & reports with any of your **connected** contacts. You can "connect" to other Portfolio Manager users by searching for their accounts and sending a connection request.



You will be brought to the "Add Contact" page. On this page, you can search for the Data Verifier's ESPM account by entering the account Name, Organization, Username, or Email. After the information has been entered, click "Search" at the bottom right.

Connect with an Existing User for Sharing

Search using any of the criteria below.

Name:

Organization:

Username:

Email:

[Search](#) [Cancel](#)

This will bring you to the Search Results page with each ESPM contact associated with the information you used to search. Find the Data Verifier’s ESPM account and click “Connect.”

City and County of Denver Department of Public Health and Environment
(Denver Department of Environmental Health)
Benchmarking with Denver Dept. of Environmental Health

[Connect](#)

Page 1 of 1 | 50 | 1 - 1 of 1

The Data Verifier’s ESPM account will be notified that your connection request has been sent. The Data Verifier will need to login to their ESPM account and click on “Notifications” on the top right.

[Account Settings](#) | [Notifications](#) | [ENERGY STAR Notifications](#) | [Contacts](#) | [Help](#) | [Sign Out](#)

The Data Verifier will be brought to the “View All Notifications” page which will display the connection request. The Data Verifier will need to check the box in the row containing the connection request and click “Accept.”

View All Notifications (116)

Incoming Requests (1) | Outgoing Requests (0) | Notices (115)

[Accept](#) [Reject](#)

Type	Notification	Date	<input type="checkbox"/>
	TouchstoneIQ Testing would like to connect with you.	6/16/2023	<input type="checkbox"/>

Page 1 of 1 | 100 | View 1 - 1 of 1

[Accept](#) [Reject](#)

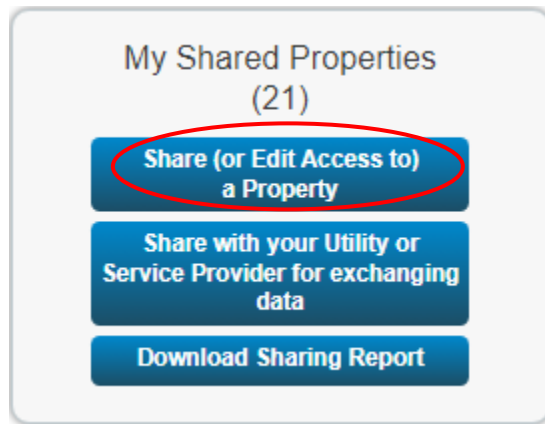
[Close](#)

4.2 Building Owner Shares the Property with Data Verifier in ESPM

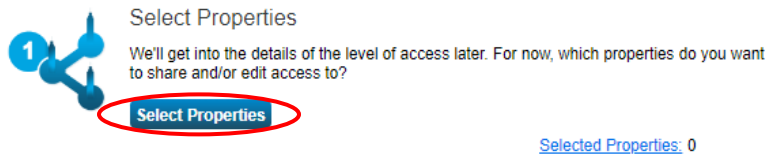
After the Data Verifier has been added as a contact in ESPM, one or more properties can then be shared with the Data Verifier’s ESPM account. To do so, login to ESPM and click on the “Sharing” tab.



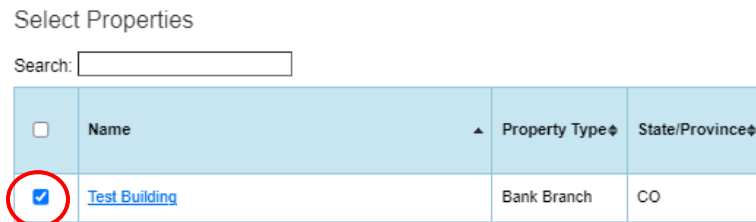
In the “My Shared Properties” section, click “Share (or Edit Access to) a Property.”



You will be brought to the “Share (or Edit Access to) Properties” page, which has three sections. In the first section, click “Select Properties.”




This will pop-up the “Select Properties” window displaying all the properties you have created in your ESPM account. For each property that will be shared with the Data Verifier, check the box on the left side of the row with the property name.



At the bottom of the “Select Properties” pop-up window, click “Apply Selection.”

In the second section, “Select People (Accounts)”, select the Data Verifier’s ESPM account name.


2  **Select People (Accounts)**

Which people (accounts) do you want to share these properties with (or modify their current access to)? The access for each can be different and you’ll be able to specify that on the next page.

Select contacts from my contacts book:

Touchstone IQ LLC Web Services Division on behalf of Matt K

In the third section, “Choose Permissions”, select the bubble by “Personalized Sharing & Exchange Data (“Custom Orders”).” Click “Continue” at the bottom of the page.

3  **Choose Permissions**

If you only need to choose one permission (because you are doing a single share or you want to give the same permissions for all of your shares), select "Bulk Sharing." If you need to assign different permissions, select the 2nd option.

* **Bulk Sharing ("One-Size-Fits-All")** - I only need to choose one permission (either because I am doing a single share OR I want to choose the same permission for all of my share requests).

Personalized Sharing & Exchange Data ("Custom Orders") - I need to give different permissions for different share requests, and/or I need to give [Exchange Data](#) permission.

Continue [Cancel](#)

This will bring you to the “Share Your Property(ies)” page to select the permissions allowed for the Data Verifier in ESPM. For each property that will be shared with the Data Verifier, select the bubble under “Full Access.” Below the table showing the properties, click “Share Property(ies).”

Name (ID)	No Access	Read Only Access	Full Access	Custom Access	Exchange Data
▼ Test Building (27925101)					
Touchstone IQ LLC Web Services Division on behalf of Matt Klahn	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	

Share Property(ies) [Cancel](#)

The Data Verifier’s ESPM account will be notified that your property(ies) have been shared. The Data Verifier will need to login to their ESPM account and click on “Notifications” on the top right. The Data Verifier will be brought to the “View All Notifications” page which will display the connection request. The Data Verifier will need to check the box in the row containing the connection request and click “Accept,” similar to the process in Section 4.1.

4.3 Building Owner Supplies Information to Support Verification

The Data Verifier may require additional information to the verification process. To support the process, it is recommended that the building owner have the following information available to share with the Data Verifier, if possible:

- Building documentation (blueprints, as-built drawings, architectural plans, PCNAs, appraisal or assessments, etc.)
- Rent roll
- Number of utility meters by fuel type
- Copies of at least one utility bill for each fuel
- List of addresses or units within the property
- Online access to utility whole-building aggregation online portals
 - [Xcel Energy Benchmarking Portal](#)
- Additional documentation of any Renewable Energy Credits (RECs), Power Purchase Agreements (PPAs), backup generator usage, electric vehicle (EV) charging, etc.

4.4 Data Verifier Confirms Benchmarking Report

As the Data Verifier is checking the benchmarking report, they may assist the building owner in updating their benchmarking data:

- to normalize the data for performance targets (breaking down high-intensity property types),
- to exclude allowable energy uses, or
- correct benchmarking data points (i.e., square footage)

Important guidance for Data Verifiers:

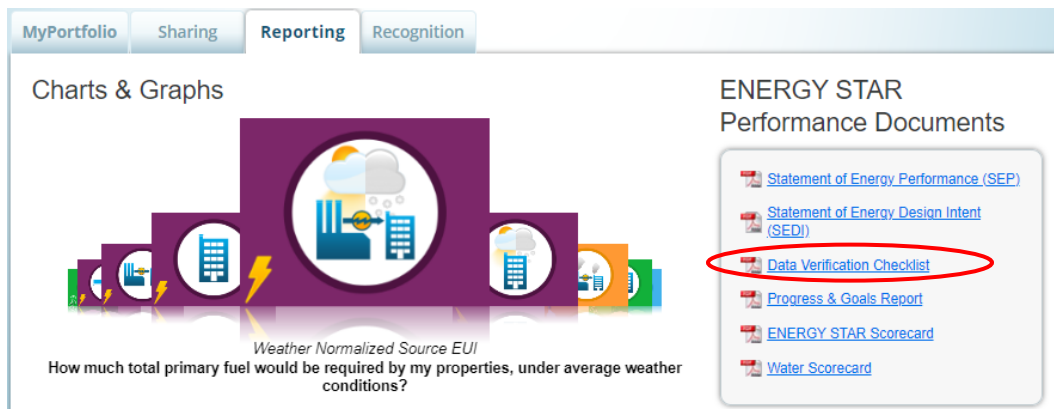
- Data verification does not require an on-site visit, but it is up to the Data Verifier if they feel confident enough to sign the document without an on-site visit.
- **Building owners can choose to benchmark their building as one property type following EPA guidance, or they may break down high-intensity property types by square footage. Ask the building owner which methodology they followed before verifying the information.**
- For the Indoor Environmental Quality section, Data Verifiers can write in “N/A” for benchmarking report submissions for performance evaluation years. If the data verification is for a target adjustment, the Data Verifier can write in “N/A” if they feel those questions do not apply to the target adjustments requested.
- If the Data Verifier is uncomfortable with the difference in square footage between what they think the square footage of the building is through supplied documentation versus what the building owner states the square footage is in ESPM, the Data Verifier is in their rights to refuse verification of the building.

4.5 Data Verifier Generates the Data Verification Checklist

The Data Verification Checklist for a property can be generated on the “Reporting” tab within Portfolio Manager. To access the Data Verification Checklist, login to ESPM and click on the “Reporting” tab.



On the right side of the “Reporting” tab, there is a section displaying standard reports generated by ESPM. Included in this section, you will see the Data Verification Checklist, circled in red below. Click on this link to access the “Generate and Download Reports” page.



MyPortfolio | Sharing | Reporting | Recognition

Generate and Download Reports

Portfolio Manager offers several standard reports for properties that can be useful in communicating your property's progress with others. These reports offer detailed information about your property for a single time period and are presented in a PDF format. [You can view sample reports here.](#)

- Select Report(s) to Download**

 - Statement of Energy Performance (SEP)
 - ENERGY STAR Data Verification Checklist (energy data only)
 - ENERGY STAR Scorecard
 - Progress and Goals Report
 - Statement of Energy Design Intent (SEDI)
 - Water Scorecard (Multifamily only)
- Select Property for Report(s)**

Property: *
- Select Timeframe for Report(s)**

Timeframe: * for:
- Select Contacts for Report(s)**

Select Property Contacts:

Primary Contact: [Add Contact](#)

Property Owner: [Add Organization](#)

Verifying Professional: [Add Contact](#)

Prefer to design your own report?

If none of these reports look like what you need, consider creating a [spreadsheet template](#) to pull the data you want and design your own report outside of Portfolio Manager.

Are you applying for recognition?

Although these reports look similar, if you are applying for either [ENERGY STAR certification](#) or [Designed to Earn](#) recognition, you must generate the required documentation by way of the application process.

Metrics on your Reports

In order to calculate metrics for your property for a given time period, there must be 12 months of complete meter data and property use detail information. If metrics (including the score) cannot be calculated for any reason, they will appear as "N/A" in your report.

Generate & Download Report(s) [Cancel](#)

This page will automatically have the ENERGY STAR Data Verification Checklist (energy data only) option checked in the first section.

In the second section, select the building requiring data verification by clicking on the “Select Property” dropdown menu. This will display all properties created in and shared with your ESPM account.

In the third section, the timeframe for which the data will be verified is selected. For the years requiring data verification for performance evaluation and benchmarking reporting requirements, from the “Timeframe” dropdown, select “Single Year.” This will display two additional dropdowns showing the end date of a month and the year. In those dropdowns, select Dec 31 and the year for which the data is to be verified. An example for the year 2024 is shown below:

3 Select Timeframe for Report(s)

Timeframe: * Single Year Ending Dec 31 2024

In the fourth section, select any contacts to be included in the Data Verification Checklist by selecting the contact from the Primary Contact, Property Owner, and Verifying Professional dropdown menus. The Data Verifier’s ESPM account should be selected as the Verifying Professional.

At the bottom of the “Generate and Download Reports” page, click “Generate & Download Report(s)” to generate the Data Verification Checklist.

4.6 Data Verifier Completes the Data Verification Checklist

The Data Verification Checklist is separated into the following four sections that will require review by the Data Verifier to be accepted by Energize Denver:

- Review of Whole Property Characteristics
- Review of Property Use Details
- Review of Energy Consumption
- Signature of Verifying Professional

4.6.1 Review of Whole Property Characteristics

The Data Verifier will need to verify the following information for the property:

1. Primary Function: Confirm that the primary use of the building is correctly defined.
2. Location: Confirm that the address is correctly entered for the property.
3. Gross Floor Area (GFA): Confirm the gross floor area is accurate for the property.

NOTE: For the Indoor Environmental Quality section, Data Verifiers can write in “N/A” for benchmarking report submissions for performance evaluation years. If the data verification is for targets adjustments, the Data Verifier can write in “N/A” if they feel those questions do not apply to the target adjustments requested. If the building is already ENERGY STAR Certified for the calendar year requiring data verification, as long as the time frame overlaps by six months or more, then the submission could be the verified application.

4.6.2 Review of Property Use Details

For each property use created for the property and submitted with the benchmarking report, the Data Verifier will need to verify the information specific to that use. At a minimum, the following information will need to be verified for each property use:

- Gross Floor Area (GFA): Confirm the gross floor area is accurate for the property use.

If the property is applying for a target adjustment, additional property use details specific to the property use will also need to be verified. For example:

- Operating Hours
- Data Center square footage
- Swimming pool location, size, and type
- Parking square footage and type (Open Parking Lot, Partially Enclosed Parking Garage, Completely Enclosed Parking Garage) and if it uses supplemental heating

4.6.3 Review of Energy Consumption

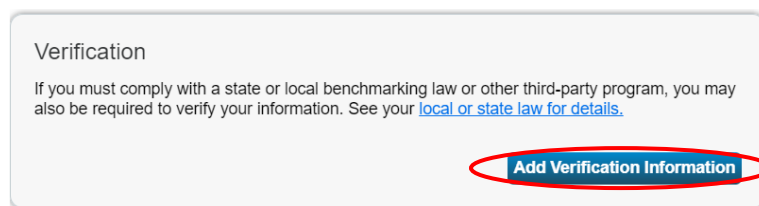
For each energy meter created for the property and submitted with the benchmarking report, the Data Verifier will need to verify the accuracy of the meter entries. At a minimum, the following information will need to be verified:

- Summary of All Associated Meters:
 - Confirm that the meters shown account for the total energy use of the building. Confirm that any additional fuels or on-site solar or wind is defined as necessary.
 - **NOTE:** *The total number of meters may differ from the total number of meters on-site. If whole-building aggregated data is provided from the utilities, this is often defined as one meter within ESPM.*
 - Confirm that the total energy consumption is accurate for each meter with the full calendar year of data entered for the year being verified.
 - Confirm the meter has the correct units aligned with the units shown on the utility bills or to be used for the whole-building aggregated data provided by the utility.

4.6.4 Complete and Sign the Data Verification Checklist


After completing the review of the previous sections, the Data Verifier will need to write their name, the date, and their signature on the final page of the Data Verification Checklist. A stamp is not required for Energize Denver. By June 1, 2026, the signed Data verification Checklist must be submitted to CASR through the Energize Denver Building Management Portal. If the data verification is being performed for a target adjustment, the signed PDF must be uploaded in the application.

The Data Verifier will also need to enter their credential information as the verifier for the property in ESPM. On the “Details” tab in the Verification section on the bottom of the page, click “Add Verification Information.”



You will be brought to the Verification Information page.

Period Ending Date for Year Verified: *

Date of Verification: * 

Verified By:

Or, enter information directly in the fields below.

Name: *

Title: *

Organization: *

Phone: *

Email: *

Postal Code: *

Professional Designations: * Professional Engineer (PE/P.Eng)
 Registered Architect
 CEM
 ASHRAE Building Energy Assessment Professional
 Other
 No Professional Designations

For the “Period Ending Date for Year Verified,” select Dec 31 with the year for which the data is verified as determined in Table 1 in Section 3.2.

For the “Date of Verification,” select the date on which the verification was completed.

For the “Verified By” field, the Data Verifier can be selected as an existing contact after completing the steps described in Section 4.1. If the Data Verifier was not added as a contact in ESPM, their information can be entered manually below this field.

After this information has been entered, click “Save” at the bottom of the page.

4.7 If Differences are Found Between Building Data and ESPM

Notes in the Data Verification Checklist will be flagged if they show that the data in ESPM is not accurate to the building information verified by the Data Verifier. The Data Verifier and the building owner must coordinate to update ESPM, download an accurate and up-to-date Data Verification Checklist, and resubmit benchmarking so that those three areas align.

The data in ESPM, the DVC submitted, and the corresponding data year’s benchmarking report submitted to the city MUST match.

4.7.1 Data Verifier or Building Owner Corrects ESPM

The purpose of the data verification process is to ensure that the data in ESPM accurately reflects the building data certified by the verifier. Since ESPM stores the data that is used for benchmarking and submitted annually, the data in ESPM must be kept current for the site energy use intensity to be properly calculated. The building’s gross floor area measurements for each use type and the energy data are used to calculate this site energy use intensity metric, and the overall property use type is used to calculate the building performance targets. These key building metrics must be properly recorded in ESPM in order to complete data verification.

If differences are found between the building data and ESPM, the data verifier and building owner must update the property type and the respective square footages of each type, ensure that the energy data is complete and auto-uploading correctly without missing data, and align the information

in ESPM to match that which is verified through onsite visits, site documentation, and insight from the building management.

4.7.2 Data Verifier Generates and Completes New Data Verification Checklist

Follow the procedure outlined in section 4.5 and 4.6 to generate and complete a new Data Verification Checklist reflecting the updates made to ESPM.

4.7.3 Data Verifier or Building Owner Resubmits Updated Benchmarking Submission

In order for the Data Verification Checklist to be approved, it must match the benchmarking submission for the corresponding data year. If any changes were made in ESPM to accurately reflect the building data, then the benchmarking submissions must be resubmitted in order to incorporate those changes.

4.7.4 Data Verifier or Building Owner Submits Data Verification Checklist to CASR

Submit the Data Verification Checklist by going to the Data Verification Submission Form. Answer the short list of questions, attach a copy of your Data Verification Checklist, and submit the form to the city.

4.8 Submit the Signed Checklist to CASR

The building owner or data verifier must submit the signed checklist to CASR as a final step:

- Go to the [Data Verification Submission Form](#)
- Answer the short list of questions
- Attach a copy of your Data Verification Checklist
- Submit the form to the city