#### MEMORANDUM

October 29, 2015

TO:

Transportation, Infrastructure, Energy and Environment Committee

FROM:

Amanda Mihill, Legislative Attorney & Millier

SUBJECT:

Worksession: Bill 35-15, Environmental Sustainability - Benchmarking -

Amendments

Bill 35-15, Environmental Sustainability – Benchmarking - Amendments, sponsored by Lead Sponsor Council President at the request of the County Executive, was introduced on September 15. A public hearing was held on October 6 at which a representative of the Executive supported the bill (see ©27).

Bill 35-15 would add an intent section to the Building Energy Use Benchmarking law, amend certain definitions, provide for alternative paths to verification, and change the private sector building group deadlines from December 1, 2016 to June 1, 2016 for Group 1 buildings (buildings greater than 250,000 square feet) and from December 1, 2017 to June 1, 2017 for Group 2 buildings (buildings between 50,000 and 250,000 square feet). Bill 35-15 is the result of a report issued by the Benchmarking Work Group – a group made of a broad set of stakeholders charged with reviewing the Building Energy Use Benchmarking law and make recommendations regarding the law's implementation.

#### Issue for Committee Discussion - Data Verification

Current law. The benchmarking law requires the owner of a covered building to assure that the reported benchmarking information for that year is verified by a licensed professional before the first benchmarking deadline and each third deadline afterwards. Current law also includes a waiver process if the owner shows that compliance will cause undue financial hardship, but would be required to use a no-cost or low-cost verification option if available.

**Bill 35-15.** Bill 35-15 would change the licensed professional to "recognized data verifier", which the bill defines as "a Professional Engineer or a Registered Architect, or another trained individual whose professional license or building energy training program credential is recognized by the Director. Bill 35-15 changes the waiver provision to allow the Director to waive the verification requirement if the owner demonstrates that the building achieved ENERGYSTAR certification for at least 6 months in the year being benchmarked.

Issues. The Apartment and Office Building Association of Metropolitan Washington (AOBA) opposes the requirement to retain the verification requirement in the law. AOBA projects that the County will not experience the same level of challenges experienced in other jurisdictions because of differences in laws. AOBA urged the following amendments:

- 1. Repeal or delay the effective date of the data verification provision until after the first reporting deadline to allow the County to determine if data verification is necessary;
- 2. Require benchmarking results and supporting records be retained for 3 years and allow DEP to review the records; and
- 3. Allow people with 10 years or more experience managing energy for a building owner or manager to be a recognized data verifier (©30-31).

In response to AOBA's concerns, DEP submitted the comments on ©58-60. To the general issue regarding verification, DEP staff argue that verification has been a central part of Montgomery County's benchmarking and transparency law from its introduction. Its inclusion is based upon the best practice of other benchmarking and transparency laws in the country. Data quality is an inherit issue. DEP identified several data quality issues throughout the Early Bird benchmarking dataset and found that there was only one submission without issues – that being the one that completed verification (voluntarily).

To the specific amendments proposed by AOBA, DEP does not support those amendments and argues:

- 1. Verification the first year allows the building owner to have the value of a knowledgeable resource and second pair of eyes as they establish their processes and procedures that will then carry them through each compliance year.
- 2. The availability of records on-file does not constitute a data verification program. To consider recordkeeping a verification program, DEP would need to collect even more information than is already set to be reported (DEP would need to seek the monthly annual energy data from each building owner, not just the annual data) and devote enormous staff resources to individually check individual Portfolio Manager accounts for proper inputs.
- 3. It would be difficult for DEP to review individual cases and make a fair judgment on what counts as energy management experience. Relying on 3rd party credentials is the fairer and more effective policy.

#### **Technical Amendment**

For clarity in the law, DEP staff recommend the following technical amendment:

Covered building means any County building, Group 1 covered building, or Group 2 covered building. Covered building does not include any building with more than 10% [occupancy] of total building square footage which is used for:

- (1) public assembly in a building without walls;
- (2) warehousing;
- (3) self storage; or
- (4) a use classified as manufacturing and industrial or transportation, communication, and utilities.

#### Council staff supports this amendment.

This packet contains:	<u>Circle #</u>
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Bill No.	<u>35-15</u>		
Concerning: Environmental Sustainability			
<ul> <li>Benchm</li> </ul>	narking - Ame	endments	
Revised: _8/3	3/2015	_Draft No	1
Introduced: _	September	r 15, 2015	
Enacted:			
Executive:			
Effective:			
Sunset Date:	None_		
Ch, La	ws of Mont.	Co	

## COUNTY COUNCIL FOR MONTGOMERY COUNTY, MARYLAND

By: Council President at the Request of the County Executive

#### AN ACT to:

- (1) add an intent section of the law;
- (2) amend certain definitions;
- (3) provide for certain alternative paths to verification;
- (4) alter the private sector building group deadlines; and
- (5) generally amend County law regarding energy efficiency and environmental sustainability.

#### By amending

Montgomery County Code Chapter 18A, Environmental Sustainability Sections 18A-38, 18A-39, 18A-40, and 18A-42

#### By adding

Chapter 18A, Environmental Sustainability Section 18A-38A

[Single boldface brackets]  Double underlining  Adde  [[Double boldface brackets]]  Adde	ed to existing law by original bill.  ted from existing law by original bill.  ed by amendment.  ted from existing law or the bill by amendment.  ting law unaffected by bill.
--	--

The County Council for Montgomery County, Maryland approves the following Act:

1	Sec.	1. Chapter 18A is amended by amending Sections 18A-38, 18A-39,
2	18A-40, an	d 18A-42 and adding Section 18A-38A as follows:
3	<u>18A-38A.</u>	Intent.
4	The i	ntent of this Article is to:
5	<u>(a)</u>	implement recommendations of the 2009 Climate Protection Plan
6		(EEC-2), 2013 Commercial Building Energy Efficiency study (Chapter
7		3.2), and support efforts of the Office of Sustainability to increase
8		energy efficiency and reduce greenhouse gas emissions in the private
9		sector and County buildings;
10	<u>(b)</u>	engage the commercial building sector with building energy
11		information crucial to adopting energy conservation and efficiency
12		opportunities;
13	<u>(c)</u>	spur market transformation by making building performance
14		transparent for the building and tenant market, allowing more accurate
15		evaluation of energy costs and creating a competitive market for energy
16		efficient buildings;
17	<u>(d)</u>	strengthen the local economy by encouraging more efficient business
18		operations and providing new opportunities for local businesses that
19		provide energy conservation and efficiency services; and
20	<u>(e)</u>	recognize building owners that have made investments to improve their
21		building energy performance and expand in-house capacity for energy
22		management.
23	18A-38 <u>B</u> .	Definitions.
24		* * *
25	Coun	ty building means any building owned by the County, or any group of
26	build	ings owned by the County that have the same property identification

27	number, that equals or exceeds 50,000 in total building square footage [square
28	feet gross floor area, as identified by the Director].
29	* * *
30	Group 1 covered building means any nonresidential building, or any group of
31	nonresidential buildings that have the same property identification number,
32	not owned by the County that equals or exceeds 250,000 in total building
33	square footage [square feet gross floor area, as identified by the Director].
34	Group 2 covered building means any nonresidential building, or any group of
35	nonresidential buildings that have the same property identification number,
36	not owned by the County that equals or exceeds 50,000 square feet gross floor
37	area but is less than 250,000 in total building square footage [square feet gross
38	floor area, as identified by the Director].
39	* * *
40	[Licensed professional] Recognized data verifier means a [professional
41	engineer] Professional Engineer or a [registered architect] Registered
42	Architect [licensed in the State], or another trained individual whose
43	professional license or building energy training program credential is
44	recognized by the Director [as defined in applicable County regulations].
45	* * *
46	[Gross floor area] Total building square footage means the sum of the gross
47	horizontal area of the several floors of a building or structure measured from
48	the exterior faces of the exterior walls or from the center line of party walls.
49	In a covered but unenclosed area, such as a set of gasoline pumps or a drive-
50	through area, gross floor area means the covered area. [Gross floor area]
51	Total building square footage does not include any:
52	(1) basement or attic area with a headroom less than 7 feet 6 inches;

53	(2)	area devoted to unenclosed mechanical, heating, air conditioning, or
54		ventilating equipment;
55	(3)	parking structure; or
56	(4)	accessory structure to a residential building.
57	18A-39.	Energy use benchmarking.
58	(a)	County buildings. No later than June 1, 2015, and every June 1
59		thereafter, the County must benchmark [all buildings owned by the]
60		County buildings for the previous calendar year and report the
61		benchmarking information to the Department.
62	(b)	Group 1 covered buildings. No later than [December] June 1, 2016,
63		and every [December] June 1 thereafter, the owner of any Group 1
64		covered building must benchmark the building for the previous
65		calendar year[. The owner must] and report the benchmarking
66		information to the Department [no later than January 1 each year].
67	(c)	Group 2 covered buildings. No later than [December] June 1, 2017,
68		and every [December] June 1 thereafter, the owner of any Group 1
69		covered building must benchmark the building for the previous
70		calendar year[. The owner must] and report the benchmarking
71		information to the Department [no later than January 1 each year].
72		* * *
73	18A-40.	Data Verification.
74	(a)	Verification required. Before the first benchmarking deadline required
75		by Section 18A-39, and before each third benchmarking deadline
76		thereafter, the owner of each covered building must assure that reported
77		benchmarking information for that year is verified by a [licensed
78		professional] recognized data verifier. The verification must be a
79		[stamped and] signed statement by a [licensed professional] recognized

80		data verifier attesting to the accuracy of the information. If the Director
81		requests, the owner of a covered building must produce the statement
82		available for the most recent year in which verification was required.
83	(b)	[Waiver] Alternative Verification Path. The Director may waive the
84		verification requirement [of] under this Section if the owner [shows that
85		compliance with this Section will cause undue financial hardship. If a
86		no-cost or low-cost verification option is available, the Director may
87		require the owner to use the alternative option] can demonstrate that the
88		building has achieved ENERGY STAR Certification for at least 6
89		months of the year being benchmarked.
90	18A-42.	Annual report; disclosure of benchmarking information.
91		* * *
92	(c)	Exceptions to disclosure. To the extent allowable under state law, the
93		Director must not make the following readily available to the public:
94		(1) any individually-attributable reported benchmarking information
95		from the first calendar year that a covered building is required to
96		benchmark; and
97		(2) any individually-attributable reported benchmarking information
98		relating to a covered building that contains a data center, or
99		television studio [, or trading floor] that together exceeds 10% of
100		the [gross square footage] total building square footage of the
101		individual building until the Director finds that the
102		benchmarking tool can make adequate adjustments for these
103		facilities. When the Director finds that the benchmarking tool
104		can make adequate adjustments, the Director must report this

data in the annual report.

105

#### LEGISLATIVE REQUEST REPORT

#### Bill xx-15

**Energy Benchmarking Amendments** 

#### **DESCRIPTION:**

The Commercial Energy Benchmarking Law, adopted May 2014, required the County Executive to convene a Benchmarking Work Group to provide recommendations regarding the implementation of the bill within the private sector, including any recommended legislative amendments. The Benchmarking Work Group is required to submit a report to the County Executive and County Council by September 2015. This bill would amend the adopted Commercial Energy Benchmarking Law, which requires certain building owners to benchmark their energy use and report it to the County for public disclosure. These amendments are proposed by the Benchmarking Work Group with the intent to

improve implementation of the law and its purpose.

#### PROBLEM:

The Benchmarking Work Group's examination of the law and its implementation with County facilities and within other jurisdictions raised concerns around specific issues, from the deadlines to verification requirements, inconsistent application between public and private facilities, and unclear definitions. These issues would directly impact implementation of the law, and the recommendations provided seek to mitigate these issues.

#### **GOALS AND OBJECTIVES:**

This bill is designed to address a variety of issues identified by the Benchmarking Work Group by adding an intent section of the law; amending certain definitions; providing for certain alternative paths to verification; altering the private sector building group deadlines; and generally amending County law regarding energy efficiency and environmental sustainability.

#### COORDINATION:

Department of Environmental Protection

#### **FISCAL IMPACT:**

**ECONOMIC IMPACT:** 

**EVALUATION:** 

#### **EXPERIENCE ELSEWHERE:**

SOURCE OF INFORMATION: Michelle Vigen, Senior Energy Planner, Division of Environmental Policy and Compliance, Department of Environmental Protection (7-7749)

#### APPLICATION WITHIN

**MUNICIPALITIES:** 

This bill applies to all municipalities that accept or adopt the County Environmental Sustainability Law, Chapter 18A.

#### PENALTIES:



### OFFICE OF THE COUNTY EXECUTIVE ROCKVILLE, MARYLAND 20850

Isiah Leggett
County Executive

#### MEMORANDUM

August 3, 2015

TO:

George Leventhal, President, Montgomery County Council

FROM:

Isiah Leggett, County Executive

SUBJECT:

Introduction of XX-15 Benchmarking Amendments

It is my pleasure to transmit the attached Benchmarking Amendments Bill and accompanying Benchmarking Work Group Report.

The Commercial Energy Benchmarking Law, adopted May 2014, required the County Executive to convene a Benchmarking Work Group, made up of a broad set of stakeholders, to (1) review the County's benchmarking process leading up to their June 1, 2015 deadline, and (2) provide recommendations regarding the implementation of the bill within the private sector, including any recommended legislative amendments. The Benchmarking Work Group is required to submit a report to the County Executive and County Council by September 2015.

The Department of Environmental Protection (DEP) convened a Work Group from a broad set of stakeholders, including an initial list of over 70 stakeholders representing utilities, building owners, nonprofits and associations, and energy service companies. The Work Group met as a whole and in committees approximately twenty times between September 2014 and June 2015. This transmittal includes both their Report and a new bill reflecting their recommendations:

- A final Report outlines the work of the Benchmarking Work Group and proposes several recommended legislative amendments to improve the implementation of the Law. Each set of amendments is introduced with a summary, justification, and textual annotations.
- Based on this Report, DEP has drafted a new bill (XX-15 Benchmarking Amendments) to
  reflect the amendments proposed within this report. This bill would amend the adopted
  Commercial Energy Benchmarking Law, which requires certain building owners to
  benchmark their energy use and report it to the County for public disclosure. Specifically, this
  bill would add an intent section of the law; amend certain definitions; provide for certain
  alternative paths to verification; and alter the private sector building group deadlines.

If you have any questions, please contact Lisa Feldt in the Department of Environmental Protection at 240-777-7730 or lisa.feldt@montgomerycountymd.gov.

IL:kdm

Attachment (s)

## Fiscal Impact Statement County Executive Bill XX-15 – Environmental Sustainability - Benchmarking Amendments

#### 1. Legislative Summary.

This bill would amend Bill 2-14 – Environmental Sustainability – Buildings – Benchmarking to:

- 1) add an intent section to the law;
- 2) amend certain definitions;
- 3) provide for certain alternative paths to verification;
- 4) alter the private sector building group deadlines; and
- generally amend County law regarding energy efficiency and environmental sustainability.
- 2. An estimate of changes in County revenues and expenditures regardless of whether the revenues or expenditures are assumed in the recommended or approved budget. Includes source of information, assumptions, and methodologies used.

The amendments proposed in Bill XX-15 would have no impact on County revenues and expenditures.

3. Revenue and expenditure estimates covering at least the next 6 fiscal years.

Bill XX-15 would create no revenue or expenditures over the next 6 fiscal years.

4. An actuarial analysis through the entire amortization period for each bill that would affect retiree pension or group insurance costs.

Not Applicable.

5. An estimate of expenditures related to County's information technology (IT) systems, including Enterprise Resource Planning (ERP) systems.

Bill XX-15 would have no impact on the County's IT systems.

6. Later actions that may affect future revenue and expenditures if the bill authorizes future spending.

Bill XX-15 does not authorize future spending and will have no impact on future revenues or expenditures.

7. An estimate of the staff time needed to implement the bill.

Staff time will not be needed to implement the changes in Bill XX-15.

8. An explanation of how the addition of new staff responsibilities would affect other duties.

There are no new staff responsibilities as a result of Bill XX-15 and the bill would not affect other duties in the Department of Environmental Protection.

9. An estimate of costs when an additional appropriation is needed.

No additional appropriation is needed as a result of Bill XX-15.

10. A description of any variable that could affect revenue and cost estimates.

Not Applicable.

11. Ranges of revenue or expenditures that are uncertain or difficult to project.

Not Applicable.

12. If a bill is likely to have no fiscal impact, why that is the case.

Bill XX-15 amends definitions and administrative procedures related to the previously adopted Bill 2-14. These amendments to Bill 2-14 do not have a budgetary impact on county operations.

13. Other fiscal impacts or comments.

Not Applicable.

14. The following contributed to and concurred with this analysis:

Matt Schaeffer, Office of Management and Budget Michelle Vigen, Department of Environmental Protection

Office of Management and Budget

## Economic Impact Statement Bill ##-15, Environmental Sustainability – Benchmarking – Amendments

#### Background:

This legislation would amend sections of Chapter 18A of the County Code as follows:

- Add an intent section of the law,
- Amend certain definitions.
- Provide for certain alternative paths to verification, and
- · Alter the private-sector building group deadlines.

Bill ##-15 essentially provides technical amendments to Chapter 18A. The amendments change the terminology of "gross floor area" to "total building square footage" and expand eligibility to complete the verification requirements to a group of "recognized data verifiers." The terminology change from "gross floor area" to "total building square footage" is to differentiate it from the term used in the software used by building owners to comply with the law and does not affect the definition or scope of the law.

The change to the current law pertaining to certain alternative paths to verification is to permit those building owners with buildings that have voluntarily achieved ENERGY STAR certification for at least six months of the year being benchmarked to not have to undertake a separate and redundant verification. This change will enable certain building owners who have achieved ENERGY STAR certification on any buildings to avoid additional costs for verification of those buildings.

#### 1. The sources of information, assumptions, and methodologies used.

Sources of information include the Department of Environmental Protection (DEP). The economic impact statement is based on information provided by DEP, and Finance has not made any assumptions or provided methodologies in preparing the economic impact statement.

#### 2. A description of any variable that could affect the economic impact estimates.

There are no variables that could affect the economic impact estimates. The change in the verification procedure would result in cost savings to any building owners who have achieved ENERGY STAR verification on any buildings.

## 3. The Bill's positive or negative effect, if any on employment, spending, savings, investment, incomes, and property values in the County.

Bill ##-15 provides an alternative path to verification and, as such, would provide a cost savings to any building owners who have achieved ENERGY STAR certification on any buildings. Without specific company data, it is uncertain as to the specific amount of cost savings attributed to the proposed change in certain alternative paths to verification.

## Economic Impact Statement Bill ##-15, Environmental Sustainability – Benchmarking – Amendments

4. If a Bill is likely to have no economic impact, why is that the case?

Please see paragraph #3.

5. The following contributed to or concurred with this analysis: David Platt, Mary Casciotti, and Rob Hagedoom, Finance; Michelle Vigen, Department of Environmental Protection.

Joseph F. Beach, Director Department of Finance Date

## Report by the Benchmarking Work Group

Providing Recommendations for Legislative Amendments to Adopted Bill 2-14 (Energy Benchmarking)

June 10, 2015

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#### EXECUTIVE SUMMARY

In May 2014, Montgomery County became the first county in the nation to adopt a benchmarking and transparency law. Section 2 of the adopted bill provided for the convening of a Benchmarking Work Group, made up of a broad set of stakeholders, to review the County's benchmarking process leading up to their June 1, 2015 deadline, and provide recommendations regarding the implementation of the bill within the private sector, including any recommended legislative amendments.

Starting in the fall of 2014, the Department of Environmental Protection (DEP) solicited participation from a broad swath of stakeholders, including an initial list of over 70 stakeholders representing, utility, building owners, nonprofits and associations, and energy service companies.

This report outlines the work of the Legislative Committee of the Benchmarking Work Group, specifically several recommended legislative amendments to improve the implementation of the Law.

Recommended Legislative Amendments:

- 1. Add Intent of the Law
- 2. Rename "Gross square footage" within the law
- 3. Remove "As identified by the Director" language
- 4. Verification: Expand credentials, revise exemption, and other guidance
  - Expanding the "licensed professional" to a "Recognized data verifier" including criteria for accepting credentials
  - b. Modification of Verification Hardship
- 5. Making requirements of County Buildings consistent with private Covered Buildings
- 6. Moving private Covered Buildings deadlines to align with reporting requirements

Each set of amendments provided with a summary, justification, and textual annotations. A version of the legislation, with all the amendments marked, is included at the end of this document.

#### BACKGROUND

In May 2014, Montgomery County became the first county in the nation to adopt a benchmarking and transparency law. This law requires certain building owners to report their building energy use to the County for disclosure on an annual basis.

Section 2 of the adopted bill provided for the convening of a Benchmarking Work Group, made up of a broad set of stakeholders, to review the County's benchmarking process leading up to their June 1, 2015 deadline, and provide recommendations regarding the implementation of the bill within the private sector, including any recommended legislative amendments.

#### Work Group Convening

The Department of Environmental Protection (DEP) solicited participation from a broad swath of stakeholders, including an initial list of over 70 stakeholders representing, utility, building owners, nonprofits and associations, and energy service companies.

This initial group was invited to an introductory meeting September 2014, where several speakers provided context for the law, including DEP, DGS, JBG Companies, AOBA, and Pepco. The Work Group opted to break into three committees to address three distinct areas of the law's implementation:

- 1. Outreach
- 2. Technical Assistance
- 3. Legislative

The Outreach and Technical Assistance committees have provided valuable guidance and advice on DEP's benchmarking programming thus far, including:

- Connections and contact information for important outreach partners, such as industry organizations, media groups, and nonprofits
- Early Bird program design, goals, and recognition
- Benchmarking Ambassadors programming
- Communication strategies for complex aspects of the law
- Review of the Benchmarking Website layout, organization, and content
- Outreach and Technical Assistance objectives, in general

These two groups have since combined into a single group that continues to provide guidance on Benchamarking programming.

The Legislative committee took a deep dive into the legislation, starting with an initial review by DEP of areas in the County's law that, compared to other jurisdictions' legislation, might benefit from discussion or clarification by the Legislative committee.

The committee worked through a list of these areas, and through discussion, solicitation of ideas from building owners aided via AOBA, and research via DEP, provided guidance to DEP to clarify points of the legislation in guidance (on the Benchmarking Website).

The committee's work also resulted in several recommended legislative amendments, which this report outlines and details.

Recommended Legislative Amendments

- 1. Addition of Intent
- 2. Renaming "Gross square footage" to "Total square footage"
- 3. Removing "As identified by the Director" in identifying covered buildings
- 4. Verification Amendments

- a. Expanding the "licensed professional" to a "Recognized data verifier" including criteria for accepting credentials
- b. Modification of Verification Hardship
- 5. Making requirements of County Buildings consistent with private Covered Buildings
- 6. Moving private Covered Buildings deadlines to align with reporting requirements

#### **Review Process**

The Legislative Committee developed these recommendations through a series of eight meetings over the course of six months. Meeting times and information, agendas, and notes were distributed through the Benchmarking Working Group email list, which is administered by DEP.

This spring, the Legislative Committee solicited comments from the Work Group as a whole, leading up to and at a Full Work Group meeting on June 10, 2015. Comments from this process have been incorporated into this final draft.

#### RECOMMENDED LEGISLATIVE AMENDMENTS

Each set of amendments is detailed below, with a summary, justification, and textual annotations. A version of the legislation, with all the amendments marked, is included at the end of this document.

#### RECOMMENDATION 1: Add Intent of the Law

#### Overview

Conversations within the Benchmarking Work Group Legislative Committee have often revolved around the importance of building owners acting on the information provided through the benchmarking process and reaping the multiple benefits of energy conservation and energy efficiency. The Working Group has noted that this intent is presented in the Law, and that it is important to clarify the purpose and value of the legislation for those that must comply with it.

#### **Justification**

- Recognize the foundational actions that led to this law The 2009 Climate Action
  Protection Plan and 2013 Commercial Building Energy Efficiency study both pointed to
  working with the commercial sector to reduce energy use and emissions. The latter
  study specifically identified benchmarking legislation as a sound strategy to help the
  County meet its emission reduction goals.
- Educate stakeholders and the broader community about the impact that building
  energy use has on the County's greenhouse gas emissions (1/3 commercial buildings,
  1/3 residential) and reduction goal of 80% by 2050.
- State clearly the energy conservation goals These goals were inherent in the initial
  drafts of the legislation within the energy audit and retrocommissioning requirements.
   Since those were removed, the energy-saving intent of the law is no longer clear.
- Identify benefits beyond energy consumption and cost savings The law can and will provide benefits beyond the energy savings results seen from other jurisdictions with benchmarking laws.

Issue	Recommended Amendment
Intent of the law	Add to the following language in the appropriate section or in an additional section:  The intent of this legislation is to:  Implement recommendations of the 2009 Climate Protection Plan (EEC-2), 2013 Commercial Building Energy Efficiency study (Chapter 3.2), support efforts of the Office of Sustainability (Bill 6-14) to increase energy efficiency and reduce greenhouse gas emissions in the private sector and County buildings.  Engage the commercial building sector with
	building energy information crucial to adopting energy conservation and efficiency
	opportunities.
	<ul> <li>Spur market transformation by making building performance transparent for the building and</li> </ul>

- tenant market) allowing more accurate evaluation of energy costs and creating a competitive market for energy efficient buildings.
  Strengthen out local economy by encouraging more
- efficient business operations and providing new opportunities for local businesses that provide energy conservation and efficiency services.

  Recognize those building owners who have made investments to improve their building energy performance and expand in-house capacity for

energy management

#### RECOMMENDATION 2: Rename term, "gross floor area" within the law

#### Overview

The legislation determines applicability to buildings based on gross floor area. The law covers buildings that have a gross floor area of 50,000 square feet or greater. The tool to complete the benchmarking, ENERGY STAR Portfolio Manager, also uses this term, but differently. A summary of differences is in the GUIDANCE: Gross Floor Area Definitions.

#### **Justification**

- This recommendation is to remove any confusion that may be caused by having the same term used in the Law and in Portfolio Manager, but with different definitions.
- The group has reviewed that the definitions for their respective purposes are appropriate, and a re-naming of the term within the Law may be beneficial.

Issue	Recommended Amendment
"Gross square	Rename "gross square footage" to "total building square footage"
footage"	
terminology	Remove "trade floors" from the list of exempted buildings – there are no trade
	floors in the County
*	Sec. 18A-38. Definitions.
	County building means any building owned by the County,
	or any group of buildings owned by the County that have
	the same property identification number, that equals or
	exceeds 50,000-square feet gross-floor area in total
35.55 · · · · · · · · · · · · · · · · · ·	building square footage., as identified by the Director.
* * * * * * * * * * * * * * * * * * * *	Group 1 covered building means any nonresidential
	building, or any group of nonresidential buildings that
	have the same property identification number, not owned
	by the County that equals or exceeds 250,000 square feet
•	gross floor area in total building square footage.
	identified by the Director.
	addiction by one birector.
	Group 2 covered building means any nonresidential
	building, or any group of nonresidential buildings that
•	have the same property identification number, not owned
	by the County that equals or exceeds 50,000 square feet
	gross floor area in total building square footage but is
	less than 250,000 square feet gross floor area in total
	building square footage., as identified by the Director.
	bulling beauty to the factor of the billocot.
	Gross floor area Total building square footage means the
	sum of the gross horizontal area of the several floors of
	a building or structure measured from the exterior faces
<i>i</i> .	of the exterior walls or from the center line of party
	walls. In a covered but unenclosed area, such as a set
· . · ·	of gasoline pumps or a drive-through area, gross floor
	area means the covered area. Gross floor area Total
	building square footage does not include any:
	(1) basement or attic area with a headroom less
	than 7 feet 6 inches;
	(2) area devoted to unenclosed mechanical,
	heating, air conditioning, or ventilating equipment;

- (3) Parking structure/ or.
- (4) accessory structure to a residential building:

## Sec. 18A+42: Annual report; disclosure of benchmarking information:

- (g) Exceptions to disclosure. To the extent allowable under state law, the Director must not make the following readily available to the public:
- (2) any individually-attributable reported benchmarking information relating to a covered building that contains a data center; or television studio; or trading floor that together exceeds 10% of the gross floor area total building square footage of the individual building until the Director finds that the benchmarking tool can make adequate adjustments for these facilities. When the Director finds that the benchmarking tool can make adequate adjustments, the Director must report this data in the annual report.

#### RECOMMENDATION 3: Remove "as determined by the Director" language

#### Overview

In the definition of Group 1 and 2 and County Covered Buildings, the definition lays out which buildings are covered and ends with ..."as identified by the Director." This language places the onus upon DEP staff to identify each individual building that needs to be benchmarked, versus the law applying evenly to all buildings that meet the definition.

#### **Justification**

- Regulation standard practice places the onus on the resident/business owner to
  comply if applicable, versus the local government identifying those individually
  responsible This language and resulting responsibility placed upon staff is not
  standard practice for regulation in general, and especially amongst other benchmarking
  jurisdictions. Other jurisdictions make an effort to identify and notify buildings that are
  covered by the law, but buildings owners that know their buildings qualify are still
  required to benchmark, even if not identified. Such an approach matches other
  regulations which apply to businesses whether or not they are identified by the
  administering agency.
- Imperfect data will result in an unrellable list of covered buildings and responsible building owners - The proposed approach is particularly important in the current situation where there is not good data available to county staff to identify covered buildings. Staff has parcel-based data and rentable square footage per building data, but not building square footage. Staff is not able to confidently identify all the buildings that will need to comply.
- DEP will still attempt to Identify and notify covered buildings This change would simply mean that a building owner with a building covered by the law must benchmark, even if DEP is not able to identify from their data sources, that they are covered.

Issue	Recommended Amendments
Removing "As	Sec. 18A-38. Definitions.
identified by the	County building means any building owned by the
Director" in	County, or any group of buildings owned by the County
determining	that have the same property identification number,
Covered	that equals or exceeds 50,000 square feet gross floor
Buildings	area, as identified by the Director.
	Group 1 covered building means any nonresidential
	building, or any group of nonresidential buildings
	that have the same property identification number, not
	owned by the County that equals or exceeds 250,000
	square feet gross floor area, as identified by the
	Director.
	Group 2 covered building means any nonresidential
	building, or any group of nonresidential buildings
	that have the same property identification number, not
	owned by the County that equals or exceeds 50,000
	square feet gross floor area but is less than 250,000
	square feet gross floor area, as identified by the
	Director.

#### **RECOMMENDATION 4: Revise and Clarify Verification**

#### Overview

Benchmarking provides valuable data on building energy use, and collecting the data and benchmarking requires time and effort on the part of building owners and managers; some may even opt to contract this work out to an energy service provider. Verification is increasingly becoming part of benchmarking and disclosure laws for many reasons. There can be a cost to verification, which the Work Group sought to address. The group discussed Chicago's approach (the only other jurisdiction currently implementing with a verification requirement), consulted the Institute for Market Transformation, and EPA ENERGY STAR in their work.

The Work Group has provided several different recommendations below to be considered in-whole together to improve the value of benchmarking and lower the potential cost of verification.

#### Justification

- Data Quality Due to the data quality issues being reported from other jurisdictions with benchmarking laws, a verification process is considered a best practice and an important component of the benchmarking process, both for the public institutions administering the programs, but also for the building owners and industry as a whole.
- Reliability and Value of Data Transparency A verification process contributes to an
  even playing field in which businesses can feel confident in the data set as a whole, and
  that their competitors are held to a similar standard for accuracy.
- Policy Decision-making In order for the County to consider benefits or incentives to aid building improvements, an accurate representation of the building stock and performance levels are necessary to identify cost-effective use of resources and target support.
- Knowledge and capacity building The discussion that will likely occur in the process
  of verification between a knowledgeable verifier and the building owner or manager
  could provide valuable information towards taking actions to reduce energy use within
  the building.
- Promote workforce development and local jobs The verification piece was also
  defended as a workforce development and local job opportunity. In-house verification is
  allowed and would encourage building owners to have their existing staff trained in
  energy management and Portfolio Manager. Verification will also drive local training
  programs and new leads for energy conservation projects.

#### **Key Changes**

- Expanded the legislated definition of Licensed Professional The cost associated
  with this part of the law is tied to the requirement of a "licensed professional" which often
  means Professional Engineer or Registered Architect. The group looked at the intent of
  verification and Chicago's model, and expanded the scope to include less costly
  credentials, redefining the "licensed professional" term to be "recognized data verifier".
- Provided guidance on type of credential accepted to do verification Criteria were also established (within their Guidance) on how DEP would evaluate additional credentials that want to qualify.
- Provided guidance on the scope of verification Based on conversations with EPA
   ENERGY STAR and Chicago, the group decided that verification should follow the
   applicable sections of the Portfolio Manager Verification Checklist. Guidance documents
   should further inform that verification can be done without an on-site visit.
- Provided guidance on how verification should be documented Again, the group followed EPA ENERGY STAR and Chicago's best practices to determine how



- verification should be documented and reported; this will be clarified in Guidance documents.
- Removed hardship exemption for this section of the legislation The group
  determined that the hardship exemption for the law as a whole was sufficient, and that
  the lower cost of verification proposed should not warrant a second level of exemption
  from this part of the law.

Issue	Recommended Amendments and Guidance
Scope of who can	Strike "Licensed professional" and replace with "Recognized data verifier"
complete the	
required	Definitions
verification	Licensed professional Recognized data verifier means a
	Professional Engineer or a Registered Architect or a
	trained individual whose professional license or
	building energy training program credential is
	recognized by the Director. Professional license
	refers to a professional engineer or a registered
	architect licensed in the State, or another trained
	individual as defined in applicable County
	regulations.
	Data Verification
	Verification required. Before the first benchmarking
	deadline required by Section 18A-39, and before each
	third benchmarking deadline thereafter, the owner of
	each covered building must assure that reported
** * * * * * * * * * * * * * * * * * * *	benchmarking information for that year is verified by
	a licensed professional recognized data verifier. The
	verification must be a stamped and signed statement by
	a licensed professional recognized data verifier
	attesting to the accuracy of the information.
Guldance on	In Guidance, DEP should include the following information:
Recognized data	
verifier	In-house or Third-party Venification
	Recognized Data Verifiers may include in-house individuals or third-party
	providers.
	Criteria to Determine Recognized Data Verifier Credential
	The Director will evaluate professional licenses and building energy
	training program credentials to be accepted as a Recognized Data Verifier
	based on the following criteria:
	<ul> <li>Demonstrates trained individuals' proficiency in building energy</li> </ul>
	benchmarking and familiarity with ENERGY STAR Portfolio
	Manager;
	<ul> <li>Demonstrates trained individuals' working knowledge of energy-</li> </ul>
	efficient operations, measures, and technology;
	Provides opportunities for ongoing skill maintenance and/or re-
	training as technologies, tools, and practices evolve;
	<ul> <li>Provides means of tracking graduates or credentialed individuals</li> </ul>
	by name and with a unique identifier (such as a license,
	identification, or other number); and

Makes training materials and records available for review by the Director and is found to be in compliance with preceding criteria. Recommended Credentials for the Director to Accept The Legislative Work Group has helped develop an initial roster of credentials they recommend the Director recognize. A full list is under Appendix A. DEP staff will also explore ways to recognize individuals qualified but without an accepted credential. Guidance on Provide minimal guidance on the scope of verification, and refer to the Verification relevant aspects of the Portfolio Manager Data Verification Checklist. Scope Provide guidance that it may be possible to complete verification without an on-site visit. Verification Require the use of the free Portfolio Manager Verification Checklist, and Documentation include the full name, credentials, and contact information (email or phone) of verifier in Portfolio Manager notes (which are submitted to the County). Verification documentation, signed not necessarily stamped should be kept as a hard copy, to be made available upon request by the Director, per legislation. Verification Remove the hardship walver. Add ENERGY STAR Certification as an Waiver alternative path to comply with verification. DEP will provide guidance on how this documentation should be transmitted to DEP. NaiverAlternative Verification Path: The Director may waive the verification requirements under this Section if the owner <del>show</del> can demonstrate that the building has achieved ENERGY STAR Certification for at least 6 months of the year being benchmarked that compliance with this Section will cause undue financial hardship. If a no-cost or low-cost verification option is available, the Director may, require the owner to use the alternative option: **DEP** provide Pro Like Chicago's pro bono verification program, DEP is encouraged, **Bono verification** particularly for the compliance period of Group 2 buildings in 2017, to program develop and implement a pro bono verification program. Such a program would solicit energy service providers willing to volunteer time to complete verification for building owners who cannot afford verification (e.g. nonprofits, churches, other buildings with particular hardships). Buildings that request pro bono verification would be published on a list (as a small

deterrence to avoid abuse of the program).

#### **RECOMMENDATION 5: County Covered Buildings and Deadlines**

#### Overview

Under the benchmarking legislation section for County buildings, the language does not use the defined term "County Buildings" but instead refers to "all buildings owned by the County" and does not provide a date for them to report to DEP, only to benchmark. This change would make the law consistently applied across County buildings and private sector buildings.

#### **Justification**

- Eliminate confusion about which buildings are to be benchmarked in the County under the law — Using the defined term, "County buildings" will clarify and make consistent the intent that is within the definition to benchmark County buildings 50,000 square feet and greater.
- Provide for reporting of data to DEP to be included in their reporting and database

   The currently language only requires benchmarking, but not reporting. To remain within the spirit of leading by example, County buildings should also report their data by their June 1 deadline each year.

Note: These changes will not take effect unless adopted through legislative amendment. For the County's first benchmarking year (June 1, 2015), DGS and DEP are working together to make sure DEP can meet their own reporting deadlines, and that DGS is meeting its obligations as best understood under the law.

Issue	Recommended Amendment				
Amend the County buildings	Amend the County buildings benchmarking language to refer to the defined term, "County buildings", and to add reporting obligation consistent with private buildings covered under the law.				
benchmarking language	18A-39 Energy use benchmarking.				
	(a) County buildings. No later than June 1, 2015, and every June 1 thereafter, the County must benchmark all buildings owned by the County buildings for the previous calendar year and report the benchmarking information to the				
	Department.				



#### RECOMMENDATION 6: Move Private Building Deadlines to June 1

#### Overview

The current set of deadlines in the legislation are not clear, do not align with reporting deadlines within the same legislation, and may cause inconvenience to major stakeholders due to the proximity to holidays. The Work Group recommends moving the deadline up to June 1.

#### **Justification**

- Two deadlines are unnecessary and confusing The legislation provides a separate
  deadline for benchmarking and for reporting. The two deadlines are unnecessary, as
  the former is unenforceable and when one benchmarks is irrelevant so long as it has
  happened before they report to the County. No other jurisdiction has two deadlines for a
  pure bill such as was adopted.
- The December 1 deadline does not align with DEP reporting requirements and may render data disclosure irrelevant— DEP is required to report to Council on the benchmarking law each October. Current deadlines mean that DEP would be reporting data that is nearly two years old. (e.g. DEP would report on and disclose CY 2015 data, reported December 2016/January 2017 in October 2017) Such a timeline would reduce the value and impact of the data disclosure.
- Benchmarking will not take 11 months to complete Jurisdictions with benchmarking laws have deadlines ranging from April 1 (DC) to typically June 1. Bills through the end of the previous calendar year are usually available by March.
- The current deadlines falls during major holidays The December 1 holiday falls
  right between Thanksgiving and Christmas holidays, which can pose difficulties in terms
  of staff availability, time out of the office, travel, and end-of-the-year reporting (for
  building owners, utility data access providers, and local government).
- The proposed deadline aligns but does not overlap with DC's deadline, which is amenable to building owners with portfolios in both jurisdictions and utility staffing availability. DC's benchmarking deadline is April 1. Utilities have requested we stagger our deadlines.

Recommended Amendments				
Adjust private building deadlines to June 1 each year to match County building deadlines and align with other benchmarking policies in the region				
and DEP's reporting deadline.				
18A-39. Energy use benchmarking.				
(b) Group 1 covered buildings. No later than <del>December</del> - June 1, 2016, and every <del>December</del> June 1 thereafter,				
the owner of any Group 1 covered building must				
benchmark the building for the previous calendar year   and <del>. The owner must</del> report the benchmarking				
information to the Department-no later than January 1				
each year.				
(c) Group 2 covered buildings. No later than <del>December</del> June 1, 2017, and every <del>December</del> June 1 thereafter,				
the owner of any Group 2 covered building must				
benchmark the building for the previous calendar year				
andThe owner must-report the benchmarking-				
information to the Department no later than January I cash year.				

#### **APPENDIX A: Recommended Verification Credentials**

These credentials are not part of a legislative amendment, but per legislative amendment, credentials must be recognized by the Director in order to qualify an individual to perform verification under the law. The following credentials are recommended by the Legislative Committee be recognized by the DEP Director as qualifying credentials.

Credential	Institution/Assoc.			
Professional Engineer (PE)	National Society of			
	Professional Engineers			
Registered Architect (RA)	American Institute of			
·	Architects			
Certified Energy Manager (CEM)	Association of Energy			
·	Engineers (AEE)			
Building Energy Assessment Professional (BEAP)	ASHRAE			
Certifled Energy Auditor (CEA)	AEE			
LEED - Professional with specialty in Operations + Maintenance (LEED-	US Green Building Council			
<u>AP O+M)</u>	(USGBC)			
LEED-Fellow – For outstanding APs	USGBC			
Building Energy Modeling Professional (BEMP)	ASHRAE			
Commissioning Process Management Professional Certification (CPMP)	ASHRAE			
Operations and Performance Management Professional (OPMP)	ASHRAE			
Certified Commissioning Professional (CCP)	Building Commissioning			
	Association (BCA)			
Associate Commissioning Professional (ACP)	BCA			
Sustainability Facility Professional (SFP)	International Facilities			
	Management Association			
Certified Building Commissioning Professional (CBCP)	AEE			
Existing Building Commissioning Professional (EBCP)	AEE			
RPA/FMA High Performance Designation (RPA/FMA-HP)	BOMI International			
Systems Maintenance Technician (SMT)	BOMI International			
Systems Maintenance Administrator (SMA)	BOMI International			
Real Property Administrator (RPA) with caveat requirements	BOMI International			
Certified Property Manager (CPM) with caveat requirements	Institute of Real Estate			
	Management			

RPA and CPM are acceptable verification credentials with the following caveats noted below. Documentation must be submitted to <a href="mailto:energy@montgomerycountmd.gov">energy@montgomerycountmd.gov</a> by the verifier each year they complete verification under the benchmarking law.

- RPA caveat: RPA must have been achieved with the elective course, Asset Management OR achieved with completion of at least 3 of the 5 Sustainability/High Performance Experience Criteria (<a href="http://www.bomi.org/uploadedFiles/2010">http://www.bomi.org/uploadedFiles/2010</a> New Site/Site-wide Images/RPA%20Experience%20Requirement-2015.pdf).
- CPM caveat: CPM must have been achieved with the following three functions selected and illustrated in the Experience Form (<a href="https://www.irem.org/File%20Library/Membership/CPMExperienceForms.pdf">https://www.irem.org/File%20Library/Membership/CPMExperienceForms.pdf</a>): #3, #30, and #33.





#### Testimony on Behalf of County Executive Isiah Leggett on Bill 35-15 Environmental Sustainability - Benchmarking - Amendments

#### October 6, 2015

Good afternoon. My name is Stan Edwards, Chief of the Division of Environmental Policy & Compliance in the Department of Environmental Protection. Thank you for the opportunity to testify on behalf of County Executive Leggett regarding Bill 35-15, which would amend the County's Commercial Benchmarking Law.

The Benchmarking Law, adopted in May 2014, required the County Executive to convene a Benchmarking Work Group, made up of a broad set of stakeholders, to (1) review the County's benchmarking process leading up to the June 2015 deadline to benchmark County buildings, and (2) provide recommendations regarding the implementation of the law within the private sector, including any recommended legislative amendments. The Benchmarking Work Group submitted a report to the County Executive and County Council in September 2015 on the results of their work. Bill 35-15 reflects the recommendations of the Work Group. Specifically, this bill would add an intent section to the law; amend certain definitions; provide for certain alternative paths to verification; and alter the private sector building group deadlines.

The County Executive would like to recognize the many individuals that participated in the Work Group process. Participants included representatives from building owners, property managers, industry associations, energy service companies, and nonprofit energy and environmental organizations. The Work Group email list included over 350 subscribers, and approximately 50 members participated actively throughout the process. The Work Group met as a whole and in committees approximately twenty times between September 2014 and June 2015. The Work Group continues to meet periodically to help ensure smooth implementation of the law heading into the first reporting period next year. The Work Group process provides an excellent example of cooperation among government, business, and environmental interests for the benefit of all parties.

The County Executive appreciates the opportunity to comment on the proposed bill. I would be happy to address any questions the Council may have.



# WRITTEN STATEMENT OF THE APARTMENT AND OFFICE BUILDING ASSOCIATION OF METROPOLITAN WASHINGTON ON BILL 35-15-THE ENVIRONMENTAL SUSTAINABILITY – BENCHMARKING - AMENDMENTS

The Apartment and Office Building Association of Metropolitan Washington (AOBA) is a non-profit trade association representing more than more than 112,000 apartment units and over 30 million square feet of office space in suburban Maryland, the majority of which, including 57,204 apartment units and 24,809,066 square feet of commercial office space, is in Montgomery County. AOBA is pleased to submit this statement on Bill 35-15 - The Environmental Sustainability Benchmarking – Amendments. The legislation proposes several amendments to the County's existing benchmarking law, three of which AOBA submits comments on below.

#### I. PROPOSAL FOR NEW JUNE 1 REPORTING DEADLINE

The legislation proposes to move the annual reporting deadline for private non-residential buildings from December 1 to June 1. AOBA supports the proposed change.

PROPOSED MONTGOMERY COUNTY BENCHMARKING REPORTING TIMELINE (Changes in red)								
GROUP	BUILDING SIZE	UTILITY YEAR DATA	REPORTING DEADLINE					
County	50,000 sq. ft. +	2014	June 1, 2015					
Group 1 Non-Residential Buildings	250,000 sq. ft. +	2015	June 1, 2016					
Group 2 Non-Residential Buildings	50,000 sq. ft. up - 250,000 sq. ft.	2016	June 1, 2017					

#### II. DELETE "GROSS FLOOR AREA" DEFINITION

The legislation proposes to substitute "total building square footage" for the phrase "gross floor area" currently referenced in the statute. The change is necessary to address differences in the

meaning of the term in Portfolio Manager and Montgomery County's law. AOBA supports the proposed change.

#### III. **DATA VERIFICATION REQUIREMENT:**

#### DATA VERIFICATION -CURRENT AND PROPOSED STATUTORY CHANGES

#### SEC. 18A-40 DATA VERIFICATION

#### CURRENT STATUTORY REQUIREMENT

#### PROPOSED CHANGES

- (a) Verification Required: Before the first(a) Verification required. Before the first benchmarking deadline required by Section benchmarking deadline required by Section 18A-18A-39, and before each third benchmarking 39, and before each third benchmarking deadline deadline thereafter, the owner of each thereafter, the owner of each covered building thatmust assure reported building must assure that reported benchmarking information for information for that year is verified by a licensed that year is verified by a licensed professional recognized data verifier. The professional. The verification must be averification must be a stamped and signed stamped and signed statement by a licensed statement by a licensed professional recognized professional attesting to the accuracy of the data verifier attesting to the accuracy of the information. If the Director requests, the information. If the Director requests, the owner of owner of a covered building must produce a covered building must produce the statement the statement available for the most recent available for the most recent year in which year in which verification was required. verification was required.
- (b) Waiver. The Director may waive the (b) Waiver Alternative Verification Path. The requirements of this Section if the owner Director may waive the verification requirement shows that compliance with this Section will cause undue financial hardship. If a no-cost or low-cost verification option is available, the Director may require the owner to use the alternative option.

#### of under this Section if the owner shows that compliance with this Section will cause undue financial hardship. If a no-cost or low-cost verification option is available, the Director may require the owner to use the alternative option can demonstrate that the building has achieved ENERGY STAR Certification for at least 6 months of the year being benchmarked.

#### SEC. 18A-38 DEFINITIONS

"Licensed professional" means professional engineer or registered architect licensed in the State, or another trained individual as defined in applicable County regulations.

#### SEC. 18A-38B DEFINITIONS

"Licensed professional" "Recognized data verifier" means a Professional Engineer or a Registered Architect licensed in the State or another trained individual whose professional license or building energy training program is recognized by the Director as defined in applicable County regulations.

<u>CURRENT LAW</u>: The County's current benchmarking law includes a provision requiring building owners to have the reported benchmarking data verified by a licensed professional. Building owners must verify the reported data after the first benchmarking deadline in 2016 and every three years thereafter.

**PROPOSED LEGISLATION:** The proposed legislation proposes to allow building owners to instead use a "recognized data verifier" to comply with this provision. The County's Department of Environmental Protection (DEP) has also published guidance, included with the proposed legislation, identifying the various acceptable credentials that will qualify an individual as a recognized data verifier. The proposed list includes, for example, several designations from institutions such as the Institute of Real Estate Management (IREM) and BOMI. AOBA commends DEP for proposing certifications which will allow more building owners to utilize onsite staff and avoid the additional cost of hiring a third-party to perform this function. It is important to note, however, that the approved list still excludes many exceptionally knowledgeable building management staff with relevant experience.

AOBA POSITION: While AOBA commends the County for expanding the list of authorized certifications, we continue to strongly oppose and question the necessity of retaining the verification requirement in the benchmarking law. The purported reason for the proposed language is an unsubstantiated need to assure the quality of the data yet to be submitted by commercial building owners in Montgomery County, many of whom are already very familiar with Portfolio Manager. Montgomery County is not the District of Columbia. We should not expect Montgomery County to experience the same level of challenges experienced in jurisdictions like the District of Columbia where the local law departs significantly from Portfolio Manager guidelines. For example, District law requires owners to report water consumption which is voluntary under Portfolio Manager, Additionally, unlike Montgomery County, the District's law also applies to multifamily buildings. Many multifamily building owners were unfamiliar with Portfolio Manager and benchmarking at the time the District's law was adopted. Notably, while there was an energy star tracking system for multifamily buildings, a rating system was not yet available for residential buildings. These are just a few examples of differences which may have resulted in inaccurate data being reported in the early years of benchmarking implementation in the District. Notably, the Montgomery County law simply requires use of Portfolio Manager by nonresidential buildings, many of whom as noted are already familiar with Portfolio Manager and reporting building energy consumption data.

#### IV. AOBA RECOMMENDATIONS

(1) Delay implementation: AOBA recommends repealing or delaying the effective date of the data verification provision until a period following the first reporting deadline. This would

<sup>&</sup>lt;sup>1</sup>See Attachment A - Energy Star Labeled commercial buildings for Maryland including Montgomery County; Attachment B Montgomery County Benchmarking Brochure, page 2 ("Over one thousand of the nearly 4,300 commercial buildings in Montgomery County have accounts in Portfolio Manager. Of these buildings, 122 have achieved a score of 75 and are certified as ENERGY STAR buildings"); Attachment C - List of AOBA members recognized by Montgomery County as Early Bird Benchmarkers; and Attachment D - Existing EPA tool to allow building owners to verify data.

provide the County with an opportunity to review actual reported data and determine <u>at that time</u>, if questions about the quality of the data warrant implementing the data verification requirement. Proceeding with the current proposal unfairly questions, *before reporting begins*, the reliability and integrity of the benchmarking data to be reported by building owners.

**AOBA amendment:** Delete current 18A-40 and amend Sec. 18A-42. Annual report; disclosure of benchmarking information by adding a new paragraph (a-1).

(a-1) Data Verification Report. The annual report submitted on October 1, 2016 shall include and analysis of: (1) any technical errors in reporting via Portfolio Manager; (2) need for additional outreach to affected building owners; and (3)(a) compliance reporting statistics, successes and challenges, including any concerns, if any, with the accuracy, completeness and correctness of the building energy data being reported by building sector and type including but not limited to commercial office buildings, universities, hospitals, campuses and building complexes; and a (b) recommendation, based on the County's analysis of the data, as to whether the County should implement a data verification requirement for private and public building owners subject to this section.

#### **AND**

(2) Incorporate DC recordkeeping requirement which allows the government to review records used to report consumption data. Review of the data will determine if a data verification provision is necessary for subsequent reporting years.

DC regulations: 21 DCMR 3513.13 A building owner shall comply with the following record retention requirements: (a) Preserve benchmark results and supporting records for a period of at least three (3) years. The records shall include: (1) The U.S. EPA Portfolio Manager confirmation email demonstrating proof-of-submission date; (2) A copy of the building owner's energy, water, and space use attribute information entered into Portfolio Manager; (3) Copies of applicable tenant information forms and letters; and (4) Additional information used to support the information required by § 3513.3(c); and (b) Make benchmark results and supporting records available for inspection and audit by DDOE during normal business hours, following reasonable notice by DDOE.

AOBA amendment: New 18A-44. A building owner shall comply with the following record retention requirements: (a) Preserve benchmark results and supporting records for a period of at least three (3) years. The records shall include: (1) The U.S. EPA Portfolio Manager confirmation email demonstrating proof-of-submission date; (2) A copy of the building owner's energy and space use attribute information entered into Portfolio Manager; (3) Copies of applicable tenant information forms and letters; and (b) Make benchmark results and supporting records available for inspection and audit by the Director during normal business hours, following reasonable notice by the Director.

(3) Approved Credentials for recognized data verifier: The approved list should be expanded to include persons with 10 years or more managing energy for a building owner or manager.

# ATTACHMENT A

#### Labeled Buildings

Building Name	Building Type	Building Owner	Property Manager	Address	City	State	Zip	Label Year(s)
71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD		2013
71033B) MONTGOMERY HOME	Retail Store	Medy's inc	Macy's Inc	17125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
71069A) TOWSON	Retail Store	Macy's Inc	Macy's Inc	801 DULANEY-VALLEY RO	TOWSON	MD		2013
(71093A) OWNINGS MILLS	Retail Store	Macy's Inc	Macy's inc	10500 MILL-RUN CIR	OWINGS MILLS	MD.	21117	2013
(1 1032) OMMINGS MIFFS	wintermination and the second	A ANICATA D. II IC.	INICY S INC	1000 WILL-RON CIR	GAITHERSBUR		<del>1</del> 21111	2013
(71113A) LAKE FOREST MALL	Retail Store	Macy's Inc	Macy's Inc	701 RUSSELL AVE	G	MD.	20877	2013
(72034A) CHEVY CHASE	Retail Store	Macy's Inc	Macy's Inc	5300 WESTERN AVENUE	CHEVY CHASE	MD	20815	2013
00149	Retail Store	Staples Inc.		7929 Eastern Ave	Baltimore	MD	21224	2014, 2012, 2011
00207	Retail Store	Staples Inc.		9091 Snowden River Pkwy	Columbia	MD	21045	2014, 2012, 2011
00240	Retail Store	Staples Inc.		1305 W 7th St	Frederick	MD	21702	2014, 2012
00302	Retail Store	Staples Inc.		405 N Center St	Westminster	MO	21157	2014
00325	Retail Store	Staples Inc.	marriesta frafesco-co/tracecomacumic como circu	615 Bel Air Rd	Bel Air	MD	21014	2014, 2012
00584	Retail Store	Staples Inc.	de se en en en en la fariable propriet de se en	6139 Oxon Hill Rd.	Oxon HIII	MD	20745	2014, 2012
ANTERE METER CONTROL OF CONTROL O	Supermarket/Grocery	and the state of the share the improvement of the state in the state of the state o	ara, mpi maa ngaraayaa faalirang kantara ind a a kirini ing kantarakan ni dina ana ing kantarakan ja milinda k Tarah	resument abbat alta ang a stagnal with tabat is kua tinda a tina ng kulona lagt na barrollo pilipina ng laurin - I - I		i. Santanggan	*	The state of the s
00626-Hagerstown, MD	Store	FOODLIONCORP	FOODLIONCORP	761 E. Wilson Blvd.	Hagerstown	MD	21740	2006
er e	Supermarket/Grocery	สร้างกลังเลียงเมื่อเป็นกับไ เล่าเกล้าเกล้านั้นกลุ่วและเราะบานโดยเหลือเลง แล้งการเล้าจากเพิ่น (ควรดานนายหลังการพัฒนา 	paipal sa risie politica in incominante antica de la cominante	tad kapatan ja stad eringdan meli in delain terunian yaran kabumunyan pilangan dap kartidan usu bi- ila	animaminingiah finika Mahalaharaharaharaharaharaharaharaharahar	eficensissis.	- The same of the same	1
00698-Denton, MD	Store	FOODLIONCORP	FOODLIONCORP	840 5th Street	Denton	MD	21629	2006
and the same of the strings of the s	Supermarket/Grocery	ng mpampananan magagas namapahan anda dama adap interfayora mpapina cekapan landar mpaning mpamini di Salimata	ersteinen society erskeintentigen serrengen in eine keine in, der eine erde	e mer fann en riden open van je nicht gine de kein der der de eine bild derenge an der berigt en ein auf bezon an bezon de	kung kananaminan dan kanangan kanangan kanangan kanangan kanangan kanangan kanangan kanangan kanangan kanangan Kanangan kanangan ka	n ferrer et seiner	g. nggi sumpagnasi ispaqin	- And gradings and starting to particular sections by the sec
01050-Smithsburn, MD	Store	FOODLIONCORP	FOODLIONCORP	22401 Jefferson Blvd.	Smithsburg	MD	21783	2006
01051	Retail Store	Staples Inc.	····	4380 Montgomery Road	Elicott City	MD	21043	2014, 2012
and and a state of the state of	Supermarket/Grocery	and part receipt their I among reprincement see many proposition you in paying by any paying their paying the case on the special and between special and	i of Arministratury configurate interests a vertical and statistic algorithms consists in East some	mints discussioner spranstores and dispersion reads the whole to be strongered approach the profession than to			. <del> </del>	1
01147-Hagerstown, MD	Store	FOODLIONCORP	FOODLIONCORP	18717 North Pointe Drive	Hagerstown	MD.	21742	2006
	Supermarket/Grocery	and the second s		-	2	1	1	
01178-Hagerstown, MD	Store	FOODLIONCORP	FOODLIONCORP	246 Eastern Blvd.	Hagerstown	MD	21742	2006
	Supermarket/Grocery		aini manaka ina kamina kam	- in the state of		1		
01180-Hagerstown, MD	Store	FOODLIONCORP	FOODLIONCORP	17718 Virginia Ave.	Hagerstown	MD	21740	2006
	Supermarket/Grocery	And the state of t					1	1
01187-Frostburg, MD	Store	FOODLIONCORP	FOODLIONCORP	17600 Hwy 40 Sw	Frostburg	MD	21532	<u></u> 12006
01222	Retail Store	Staples Inc.		8115 Honeygo Blvd	Nottingham	MD	21236	
01289	Retail Store	Staples Inc.	man and the second second	9616 Reisterstown Road	Owings Mills	MD	21117	2014
	Supermarket/Grocery			1			1	
01316-Bryans Road, MD	Store	FOODLIONCORP	FOODLIONCORP	2960 Marshall Hall Rd	Bryans Road	MD	20616	2006
<ul> <li>Only the second section of the second second section second section second second second section second second</li></ul>	Supermarket/Grocery		1				Î	1
01356-Accokeek, MD	Store	FOODLIONCORP	FOODLIONCORP	15789 Livingston Road	Accokeek	MD.	20607	12006
Annah Tanah Ta	Supermarket/Grocery			- in the second	ş.	].	1	1
01405-Middle River, MD	Store	FOODLIONCORP	FOODLIONCORP	1413 Fuselage Ave	Middle River	MD	21220	12006
	Supermarket/Grocery							
01543	Store	FOODLIONCORP	FOODLIONCORP	121 North Crain Hwy	Gien Burnie	MD	21061	2005
01559	Retail Store	Staples Inc.		8861 Branch Ave	Clinton	MD	20735	2014, 2012
The second secon		Change and the second of the s		1	1	1	1	2014, 2012,
01560	Retail Store	Staples Inc.		3024 Donnell Drive	Forestville	MD	20747	2011, 2010
	Supermarket/Grocery	भू रहता । १९८० च्या १ वर्षा । व्यापार शास्त्र । १४१ वर्षा व्यापार व्यापार व्यापार व्यापार व्यापार व्यापार व्या विकास			- 14 27 AND	Ĺ		1
01653-Essex, MD	Store	FOODLIONCORP	FOODLIONCORP	1565 Hyde Park Rd	Essex	MD	21221	2006

71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
anna Daniella sem	Supermarket/Grocery							
1661-Rockville, MD	Store   Supermarket/Grocery	FOODLIONCORP	FOODLIONCORP	845 Rockville Pike	Rockville	MD	20852	2006
1683-Hagerstown, MD	Store	FOODLIONCORP	FOODLIONCORP	18360 College Rd	Honoretour	MD	21740	anne
1885 - 20 Wight Avenue	Office	Liberty Property Trust		20 Wight Avenue	Hagerstown Cockysville	MD	21030	
1000 - 20 VANILL VACIORS		TLIDEITY F CHERTY LIUST	Thosas Linear Linear Linear	120. Valid (VACI of a	COURADANC	NO.	14.1030	2013, 2012,
01935 - 4 North Park Drive	Office	Liberty Property Trust	į.	4 North Park Drive	Hunt Valley	MD		2011, 2010
01936 - 6 North Park Drive	Office	Liberty Property Trust	Liberty Property Trust	6 North Park Drive	Hunt Valley	MO	21030	2012
<del>ernergy, y a farry to the Art of the farry of the farry for the farry for the farry for the set of the set of the farry for the</del>	Supermarket/Grocery	อที่เกี่ยนในเทียงเข้าเทียงเข้าเกี่ยง เรียบเข้า เกี่ยงในการแบบแบบ แล้วเกาะเกาะเกี่ยงแบบเกี่ยงแบบข้อง เกาะเกรียบ เกี่ยง	to comprehensive and training party of the second party and the second p	A STATE OF THE PARTY OF THE PAR		1	de la companie	inimizina in manana manana
)2523	Store	FOODLIONCORP	FOODLIONCORP	466 Ritchie Hwy	Severna Park	MD	21146	2005
te egypty. Cel ( ) a an inn handarus (na isi aleaj pi tykyttä toin äärjasi esi päri piet piet piet ka i 1 1944 naraiga	Supermarket/Grocery	tog transitions is identicible in in in it is in	and appear of Barbaria in the state of the second s	and the state of t	V add to de tales a allega de la contrata de contrata de la contrata del la contrata de la contrata del la contrata de la contrata del la co	1	1	\$1.00 \$100 1 \$100 \$100 \$100 \$100 \$100 \$1
)2703-Walkersville, MD	Store	FOODLIONCORP	FOODLIONCORP	8425 Woodsboro Pike	Walkersville	MD	21793	2006
and a no an alone and a solid in information and an analysis and a solid and a solid and a solid and a solid a	Supermarket/Grocery	and distributed the second of the second second Second second se	eralmas umangagara palas karing umanda un eranda metro ales de para	и <del>лде тому и бол фило мучен или по об</del> ису и недорогфункт из СС прифе далух филому до прической постобо и постобо ———————————————————————————————————	inger providence parameter providence parameter paramete	1		-
2704-Frederick, MD	Store	FOODLIONCORP	FOODLIONCORP	2060 Yellow Springs Rd.	Frederick	MD	21702	2006
	Warehouse and					1	1	
14981	Storage	Staples Inc.	Staples Inc.	7021 Dorsey Road	Hanover	MD		2011
1 Verizon - Constellation Place	Office	Verizon	Verizon	Constellation PI - 1 Pratt St.	Baltimore	MD	21202	2002
		P.	•	The state of the s			and the same of th	2015, 2014,
100 5	lam.		1			1	0.000	2013, 2012,
100 East Pratt Street	Office	Green Concepts International, LLC	David S. Brown	100 East Pratt Street	Baltimore	MO	21202	2011, 2010
100 Claimtean Mill	0.00	In O O Falancia		400 Deleter MR DJ	Outon 16lls	MD	101417	2010
100 Painters Mill	Office	David S. Brown Enterprises	Enterprises McShea Management,	100 Painters Mill Rd.	Owings Mills	- Mr	21117	Z010
100 West	Office	Realty Associates Fund IX	Inc.	100 West Road	Baltimore	MD	21204	2012
TOUR TOUR AND THE REST OF THE PERSON OF THE	physics promises in the contract of the contra	Augly voormenament in its in	10001 New	100 YESE RUGU	COMBINA	1110	121204	
	i de la companya de l	1.	Hamphshire Avenue,	1	<u>.</u>	.[	4	1.
10001 New Hampshire Avenue	Office	10001 New Hamphshire Avenue, Inc.	inc.	10001 New Hampshire Avenue	Silver Spring	MD	20903	2012
A STATE OF THE PROPERTY OF THE	Samuel and Samuel and	And a summission with the sum of	Kohl's Department	Entre constitution confidence parameter suprementation of the confidence in security of the confidence in the confidence		de production		
10171-Glen Burnie	Retail Store	Kohl's Department Stores	Stores	418 George Clauss Blvd	Severn	MD	21144	2009
10172-Salisbury	Retail Store	Kohl's Department Stores	AMESCANIS STATEMENT STATEMENT OF SECURITY	1128 West Dagsboro Road	Salisbury	MD	21801	2011
10264-Ellicott City	Retail Store	Kohi's Department Stores	er ant en en frie fan en stiffen in de en	4320 Montgomery Road	Elicott City	MD	21043	2010
10265-Germantown	Retail Store	Kohl's Department Stores		20918 Frederick Road	Germantown	MD	20876	2011
10266-Laurel	Retail Store	Kohr's Department Stores		3323 Corridor Marketplace	Laurel	MD	20724	2014
10267-Waldorf-Solar	Retail Store	Kohi's Department Stores		11120 Mall Circle	Waldorf	MD	20603	2013
10315-Silver Spring	Retail Store	Kohl's Department Stores		12024 Cherry Hill Road	Silver Spring	MD	20904	2010
10350-Frederick	Retall Store	Kohl's Department Stores		7350 Guilford Drive	Frederick	MD	21704	2012
10392-Severna Park	Retail Store	Kohr's Department Stores	nisiristikarist järäväntin etti karainista ain eta	575 Ritchie Highway	Severna Park	MD	21146	2011
40.00 M. J. A.		A CONTROL OF THE CONT	Kohl's Department			1		nana
10463-Bel Air	Retail Store	Kohi's Department Stores	Stores	5 K Bel Air South Parkway	Bel Air	MD	21015	15000
ARIARIA INI		4.14. 5	Kohl's Department		f	1	04457	7000
10491-Westminster	Retail Store	Kohr's Department Stores	Stores Kohl's Department	840 Market Street	Westminster	MD	21157	12003
10492-Eldersburg	Retail Store	Kohl's Department Stores	Konrs Department	1324 Londontown Blvd.	Eldersburg	MD	21784	2009
1945 Elical spring	Acres de la	TANNER O UCIDAL BIRGER COUPES Transport transport transport from the consumption of the property of the property of the property of the property of the consumption o	Kohr's Department	FIGT EDITIONS CHAIR	Tringlement	WILF	. £1104	LUUS
10665-Timonium	Retail Store	Kohl's Department Stores	Stores	50 West Ridgely Rd	Timonium	MD	20193	2008
CONTRACTOR OF THE STATE OF THE	Committee of the commit	FOR IT & LIGURE SHEET SHEETS Spen throughout desired describeration to the continue of the con	Kohl's Department	100 Free Medit IV	interest in the second	in in	E0193	Secretarian de la constitución d
10987-Hagerstown	Retail Store	Kohl's Department Stores	Stores	17145 Cole Road	Hagerstown	MD	21740	12008
Contract Con	22 TOREN OUT G	in a mei an an den fellen en geneg er gegen er de ble en gegen gegen geneg standpred en terpel en ferte betre en de se d	AMO GO	The state of the s	enemele (serielle entergeneme entergenemele En stretten entergeneme	undernythen		***************************************
1100 Wayne Avenue	Office	Brandywine Realty Trust	.1	1100 Wayne Avenue	Silver Spring	MD	Innain	2015, 2014, 20



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
			Kohr's Department			L_	1	
11304-LaVale	Retail Store	Kohl's Department Stores	Stores	12101 Winchester Rd Ste. 2A	LaVale	MD	21502	
11317-Lexington Park	Retail Store	Kohi's Department Stores	······································	22555 Three Notch Road	re concern an experience and arrival and an experience and arrival and arrival and arrival and arrival arrival	MD	20653	2011
11329-Middle River	Retail Store	Kohl's Department Stores		1420 Martin Blvd	Middle River	MD	21220	2011
11330-Forest Hill	Retail Store	Kohl's Department Stores	ga qa aanay qaya gayay aa gayaayay yayabiya ga ahaad ga ad ahaad barad baraday	50 Osborne Parkway	Forest Hill	MD	21050	2012
11352-Annapolis	Retail Store	Kohl's Department Stores	er for sametaffere der anne bestemmt gegar vor er regiser to real se risk of the state of	i 250 Solomons Island Road	manuscratic and a manuscratic and a manuscratic	MD	21401	
11443-Easton	Retail Store	Kohl's Department Stores		207 Mariboro Road	Easton	MD	21601	2013
11480-Aspen Hill	Retail Store	Kohi's Department Stores	-	3901 Aspen Hill Rd	Aspen Hill	MD	20906	2014
1234 - 201st Ops	Office	113th WG	ation in the second second	1234 Menoher Dr.	Andrews AFB	MD	20762	2013
12410 Milestone Center Drive	Office	MEPT/Kennedy Associates	CB Richard Ellis	12410 Milestone Center Drive	Germantown	MD	20876	2010, 2009, 2008
anan nathan	0.00		JBG/12420 Parklawn,			1		
12420 Parklawn	Office	JBG/12420 Parklawn, LLC	i ILLC	12420 Parklawn Drive	Rockville	MD		2013, 2012
125510 - Summit at Washingtonian	Office	American Real Estate Partners	- pri po internito con gerministo dels del sectorio de que participa del primo del democrimo en income en income.	9711 Washingtonian Blvd	Galthersburg	MD	20878	
1401 Mercantile Lane	Office	Knollwood Development Corporation		1401 Mercantile Lane	Largo	MD	20774	2015, 2012
1401 Rockville Pike - Woodmant Office Center	Office	Government Properties Income Trust	Reit Management &	1401 Rockville Plke	Rockville	MD	20852	2014, 2013, 2012, 2011, 2010
Control of the Contro	Supermarket/Grocery	gorgene sam, anagaithte haife dorah aidge gan mhaise, ar stàire a mha dheasa a ha bh a the arigne sa stàire in B		ration of the state of the second state of the second seco		-	-	den en e
1442	Store	FOODLIONCORP		6920 Crestwood Blvd	Frederick	MD	21703	2013, 2010, 2006
	Supermarket/Grocery			}		Ī	1	4
1477	Store	FOODLIONCORP		883 Russell Ave	Gaithersburg	MD.	20879	2013
1662	Supermarket/Grocery Store	FOODLIONCORP		410 Sandy Springs Rd	Laurel	MD	20707	2013, 2008, 2005
Managara Waliongia osias shiribani an tamin da abamada yaki sama da da da ifakilani ilada bariyi ma tulunuki baga abamisa an iya iga		Andreas and communications and representations are accommission and a convention of the second secon	Washington Real	iki girangan sarahi, in na taka garah sarah sarah Sarah sarah sa	# : # : # : # : # : # : # : # : # : # :			i.
1700 Research	Office	Washington Real Estate Investment Trust	Estate Investment Trus	1700 Research Blvd	Rockville	MD	20850	2011, 2009
2024 Building	Office	Johns Hopkins University School Of Medicine		2024 E. Monument St.	Baltimore	MD	21205	
20400 Observation Drive	Office	Guardian Realty Management, Inc.	times to the state of the state	20400 Observation Drive	Germantown	MD	20876	2013
20410 Observation Drive	!Office	Guardian Realty Management, Inc.	ر به در	20410 Observation Drive	Germantown	MD	20876	
and the state of t	militari de la mailine de la manación de la challa	A TRICATURE PRINCIPAL AND A TRACE OF THE PRINCIPAL OF THE PRINCIPAL PRINCIPAL PRINCIPAL COMPANY OF THE PRINCIPAL OF THE PRINC	Reit Management &	and the property of the second	dert man in their estate ale a service and a service service and a servi	1		
2115 East Jefferson Street	Office	Government Properties Income Trust	Research LLC	2115 East Jefferson Street	North Bethesda	MD	20852	2014
and the state of t	i ja samarit merinipantai antaini katawa saatta katawa	Commencement in the comment of the c	MacKenzie	ali di per emperophico paramento de esta especial paramento de esta esta esta esta esta esta esta est	rational pumpirus producti despuis de la communicación de la commu	-		***************************************
226 Schilling	Office	Baltimore MD Green II, LLC	Management	226 Schilling Circle	Hunt Valley	MD	21031	2014
		1	-	The state of the s				
			- {			l.	Ì.	2015, 2014,
	1	*	4	250 West Pratt Street	j.	1	l:	2013, 2011,
250 West Pratt Street	Office	Behringer Harvard Property Trust	1	Suite 130	Baltimore	MD	21201	2010, 2009, 2008
	Supermarket/Grocery	Land the state of				1	1	<b></b>
2566	Store	FOODLIONCORP	trationaries and contemporaries are almost as an area or an earth and	12675 Laurel Bowie Road	Laurel	MD	20708	2013, 2010, 2005
	į.		· <b>‡</b>				1	2015, 2014,
	**************************************		1			1		2013, 2012,
2800 Tower Oaks Blvd.	Office	Boston Properties Washington Regional Office	A TANANTAN AND AND AND AND AND AND AND AND AND A	2600 Tower Oaks Blvd.	Rockville	MD	20852	2011, 2010
	SupermarkeVGrocery					1	1	-
1 <u>2614</u>	Store	FOODLIONCORP	nami secure calimini escribira de la calenda de la cal	11007 Manklin Creed Rd	Berlin	MD	21811	2013
	Supermarket/Grocery							1
2630	Store	FOODLIONCORP	tacing inggapi and bourses in administration that he can be included in	5301 Pulaski Hwy	Perryville	MD	21903	
2765-Easion MD	Retail Store	JCPenney	JCPenney	219 Marlboro Ave Ste 21	Easton	MD	21601	12009
303 International Circle	Office	Memitt Properties	Merritt Properties	1303 International Circle	Hunt Valley	MD	21030	12012



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Mady's Inc	7126 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
807 International Circle	Office	Liberty Property Trust	Liberty Property Trust	307 International Circle	Hunt Valley	MD		2011, 2010
275 Berinett Creek Avenue (LGA)	Office	LGA	. ]	3275 Bennett Creek Ave.	Frederick	MD	21704	2014, 2013
			America's Capital				1	
300 75th Avenue	Office	America's Capital Partners	Partners	3300 75th Avenue	Landover	MD	20785	2009
0 Gude	Office	Washington Real Estate Investment Trust		40 West Gude Drive	Rockville	MD	20850	2009
Andrew Committee State of Antique Committee Co			Reit Management &				Ĭ	2014, 2013,
1700 River Road - USDA at Riverside	Office	Government Properties Income Trust	Research LLC	4700 River Road	Riverdale	MD		2011, 2009
1 Monroe	Office	Washington Real Estate Investment Trust		51 Monroe Street	Rockville	MD	20850	2014
			1	•				2014, 2013,
	1		1.			į.		2012, 2010,
5515 Security Lane	Office	Rockwall I and II, LLC		5515 Security Lane	Rockville	MD	20852	2009, 2004
			1		Ì	k k		2013, 2012,
6630 Fishers Lane	Office	JBG/5630 Fishers, LLC	JBG/5630 Fishers, LLC	5630 Fisher Lane	Rockville	MD	20852	2011,2010
					1	\$. •		2015, 2014,
5635 Fishers Lane	Office	JBG/BC Fishers III, L.P.	and area of the last investigation of the second	\$5635 Fishers Lane Suite 0200	Rockville	MD	20852	2013, 2012
•	ļ	1	1		<u>.</u>	Ī		1
300 Jefferson Plaza	Office	Washington Real Estate Investment Trust	اً - الله المعادلة	1600 Jefferson Street	Rockville	MD	20852	2013, 2011, 2009
The second secon						ľ		2014, 2013,
5110 Executive Blvd	Office	Washington Real Estate Investment Trust	ing . analysis, and profile and all the same and a second and a	16110 Executive Blvd	Rockville	MD	20852	2011, 2008
			Reit Management &					
6300 Security Boulevard	Office	Government Properties Income Trust	Research LLC	6300 Security Boulevard	Woodiawn	MD		2015, 2013
3411 Ivy Lane, Greenbelt MD	Office	Mack-Cali Reality Corporation	dannan printe and your again manager than 15 feet that from the grap promises.	[6411 lvy Lane	Greenbelt	MD	20770	2015
	1		Vomado/Charles E.	1	<u>.</u>	ĵ	j	1
6500 Rock Spring Dr	Office	Vomado/Charles E. Smith	Smith	16500 Rock Spring Dr	Bethesda	MD	20817	2010 2015, 2014,
The state of the s	1				İ	ľ	1	
	į		**	**************************************	1	ľ.	1	2012, 2011,
	4			:1	1	Î.	1 .	2010, 2009,
					1	į	1	2008, 2004,
6701 Democracy Blvd.	Office	Vornado/Charles E, Smith	Land after et als Land hand for the San State and Land Land Land Land Land Land Land	6701 Democracy Blvd.	Bethesda	MD	20817	2003, 2002
				• •	i i	ŧ.	ľ	2015, 2014,
	<u>.</u>		1		1	į.	1	2011, 2010,
	į		ŧ.		ł	1	1	2009, 2008.
	1		Ť	J			20047	
6707 Democracy Blvd.	Office	Vomado/Charles E. Smith	ومعترين والمتراجه مونكيوه أودو وشرافه ومدراونون ويستعوره وأأنك بأداره ويعاردون	6707 Democracy Blvd.	Bethesda	MD	12081/	2004, 2003, 200
	1			land the state of	1	į	1	2010, 2009,
	ž.			<b>4</b>		ŀ	-	2007, 2006,
AWAR 64 - 43 - 4 - 64 - 4	107		Transwestern	January III de la Principal de	Jn. 14 4-	lun.	100047	2004, 2003, 200
6710 Rockledge Drive	Office	TIAA-CREF	[Commercial Services	6710 Rockledge Drive	Bethesda	MD	2001/	2015, 2014,
7404 MICOONIDIS ASSESSED		December 1850 Ave 11 O		7101 WISCONSIN AVENUE	BELTSVILLE	MD	20814	2012, 2011
7101 WISCONSIN AVENUE	Office	Brandywine Wisc Ave LLC  JBG/7200 Wisconsin, LLC		7200 Wisconsin Avenue	Bethesde	MD		2015, 2014
7200 Wisconsin Avenue	Office	17201 Wisconsin, LLC	7201 Wisconsin, LLC	7201 Wisconsin Ave	Beinesda	MD	20814	12013, 2017
7201 Wisconsin 7240 Parkway Dr	Office	Anne Arundel MD Green, LLC	Colliers International	7240 Parkway Dr	Henover	MD	21076	12012
1540 LSIPASA FIL		TO STATE WATER OF THE PROPERTY	Cours including	FETU FILINGS LA	nimitation in the same production in the same part of the	INIT.		TAM AT MARKET MARKET MARKET PARKET A CONTRACTOR OF THE PARKET P
			i.		Ţ		4	2014, 2013,
750 East Pratt St	Office	750 East Pratt, LLC	Cassidy Turley	750 East Pratt Street	Baltimore	MD	21202	2012, 2011, 201
CONTRACTOR OF THE OWNER OF THE PROPERTY OF THE OWNER OW	in the state of th	arapiteishishishishishishishishishishishishishi	individual control of the second	- I LAA FREST LIGHT AREAS AND FOR FREST AND FREST AND ASSESSED FOR FREST AND ASSESSED FRE	deritation and the second	rimpinging	in the state of th	



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MO	20817	2013
	i principali di Carantina di Ca				agi Aga aga aga aga aga aga aga aga aga aga	1		2015, 2014,
		epart.	į.	∰.		4	:1	2012, 2010,
7501 Wisconsin Ave.	Office	7501 Wisconsin LLC		7501 Wisconsin Ave	Bethesda	MD		2009, 2008, 2007
811 Montrose	Office	Willco Companies	Wilco Companies	7811 Montrose Road	Rockville	MD	20854	2012
and the second s		F	any man a a managana kaominin'i Sardana no ao	gives referentemente en utan e genge taller e pe pate pa cali gans e di brasileri en merrera nin Gives delen en mente en utan e genge taller e pe pate pa cali gans e di brasileri en merrera nin	ang dan ngang pilang dan pangkap parini na ngalawa na ngang panangan ang	11/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1	ويعدون أووته	2014, 2013,
301 Thampson	Office	Behringer Harvard Property Trust		801 Thompson Avenue	Rockville	MD	20852	2012, 2010
8484 Georgia Avenue	Office	Brandywine Realty Trust	ear-lifter and set set of the set	8484 Georgia Avenue	Silver Spring	MD	20910	2015, 2014
3701 Georgia Avenue	Office	Guardian Realty Management, Inc.	And the second s	8701 Georgia Avenue	Silver Spring	MD	20910	2013
Anna Lances and courses and a complete and in a complete and and the special property of the special of a state of the special o	and the state of t	ming to receive the material of the content of the content of the content of the content of the property of the content of the	Washington Property	efferilgijanski pos pise za poetil kat odprejs menete noodilisk friktionlet ingenet besplagesferisk } }	varges and constructive and fine that is the best about 1 - 1 - 1 (1 th 1		-	Act
3757 Georgia Avenua Office Building	Office	Washington Property Company, LLC	Company, LLC	8757 Georgia Avenue	Silver Spring	MD	20910	2013, 2008
The state of the s	The second second	die entstern fall ist men ein anderge gen, vonzigen ein gegen eine gange Phintiphy bei beiere erfere bat deremptet ziel beier bereite bei	tariette, hele hingere printe valler sitt in deputation production and an appearance		n een, ja aringsen neria sielija ee daad eel isekaal qabiil sie maa Mareya ad L	in diameter	1	2014, 2012,
3200 Corporate Bivd.	Office	Pledmont Office Realty Trust		9200 Corporate Blvd	Rockville	MD	20850	2011, 2010
9500 Arena Drive	Office	Knollwood Development Corporation		19500 Arena Drive		MD	20044	7045 2044 2000
3000 Mena Dilve	William Child	IMMINION DARBONHEUR COLDOI 98011	حادوتها والجاورون والمارات والمراورة والمؤول والمؤوث والمؤود والموادون	Jaonn Wiglis Dilas	Largo	JIND	20014	2015, 2011, 2008
0704 Amello Ordon	0.00	Walland Barrier 10	independent	0704 4		-{	00274	-
9701 Apollo Drive	Office	Knollwood Development Corporation	arin managalita interpretation de la company	9701 Apollo Drive	Largo	MD MD		2015, 2011, 2008
9770 Patuxent Woods Drive	Office	Liberty Property Trust	Liberty Property Trust		Columbia	MD		2014, 2013
Aerotek		Allegis Group	ann an airean an Landaine ann a t-ann ann an aire a t-an airean a t-an airean airean airean airean airean aire	17301 Parkway Drive	Hanover			
Air Rights Center North Tower	Office	Bethesda ARC, LLC	Jones Lang LaSalle	4550 Montgomery Avenue	Bethesda	MD	20814	12U11
			Marriott International,	L		1	1	
Annapolis Courtyard	Hotel	Marriott International, Inc.	inc.	2559 Riva Rd	Annapolis	MD	21401	2006
					i, i	ļ		2015, 2014,
		*	*		Annapolis	1	Ì	2013, 2012,
Annapolis Junction	Office	Boston Properties Washington Regional Office		8210 Dorsey Run Ro	Junction	MD		2011, 2010
ANNAPOLIS, MD-2102 - jcp	Retail Store	JCPenney	JCPenney	1695 ANNAPOLIS MALL	ANNAPOLIS	MD	21401	2013
Anne Arundel County Public Schools Belle C	Srove!		· ·		The second second			
Elementary School	K-12 School	Anne Arundel County Public School	inglistica in the six construction as well as a section of the six	4502 Belle Grove Road	Baltimore	MD.	21225	2014
			***			1		
Annie E. Casey Foundation	Office	Annie E, Casey Foundation	CBRE   Asset Services		Baltimore	IMO	21202	2012, 2005, 200
			į.	5537 Twin Knolls Road		Ţ	į	ľ
Arium Office	Office	Arium AE	Arium AE	Suite 435	Columbia	MO	21045	2010
	Senior Care	A series of the	Atria Management					
Atria Salisbury	Community	VTR Salisbury Business Trust	Company, LLC	1110 Healthway Dr	Salisbury	MD	21804	2014
	¥11	And the state of t	Marriolt International,				1	I
Baltimore / BWI Airport Residence Inn	Hotel	Marriott International, Inc.	∮lnc.	1160 Winterson Rd	Linthicum	MD	21090	2006
A STATE OF THE PROPERTY OF THE		A STATE OF THE PARTY OF THE PAR	Marriott International,			.]		1
Baltimore / Hunt Valley Courtyard	Hotel	Marriott International, Inc.	Inc.	221 International Circle	Hunt Valley	MD	21030	2006
and he care consistence a later soler a metaral manifestic later is a later as a manifest and before 6 per he manifestic metal 15 & 2	And against an interior of the continues		Marriott International,	references and representation of the second	Linthicum			l .
Baltimore BWI Airport Courtyard	Hotel	Marriott International, Inc.	ing.	1671 W Nursery Rd	Heights	MD	21090	2007
BALTIMORE, MD-0982	Retail Store	JCPenney	es a mate and a differ product a product of a reproduct to the second of a second of a second of a second of a 2	7777 EASTPOINT MALL	BALTIMORE	MD	21224	2014
BALTIMORE, MD-1869-MS - jcp	Retail Store	JCPenney	JCPenney	8200 PERRY HALL BLVD	BALTIMORE	MD	21236	2013
Bayside Elementary School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	1301 Church Street	Stevensville	MD	21666	
BEL AIR, MD-0209	Retail Store	UCPenney	and the same of the same and the same of t	3411 Merchant Blyd	Abrigdon	MD	21009	
و به در	***************************************	fred describention of supplies as travels and produced and another form to the supplies of the supplies of produced and the supplies of the su	a est dans ra de reju for se puda é la destar en latination des aindas de cada de la cada es est	and a second and a select a second included and and second second second second as a second second as a second The second	entermon alimita de l'arriva Malari di Arabiani L	undina na	intiduction in its	en principalita en maiorismo de militare de la constitución de la cons
Bethesda Crescent 4600	Office	Brookfield Properties		4600 East West Highway	Bethesda	MD	20814	2015, 2013, 201
Baibanda Arrana 7404	0.55			7404 141	D-#	1	2004	20044 2042 204
Bethesda Crescent 7401	Office	Brookfield Properties	and the second s	7401 Wisconsin Avenue	Bethesda	MD	ZU014	2014, 2013, 201



71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
		÷čas y za				ŀ	1	2014, 2013,
teibnode Consont 7475	Office	Economical Conservation		i: 17475 Wisconsin Avenue	Dethands	MO	20044	
Beilhesda Crescent 7475	Office	Brockfield Properties	ranto de fait de santo de la companya del la companya de la compan	1/4/5 YVISCONSIN AVENUE	Bethesda	Min	20014	2012, 2011, 201
Bethesda Office Center	Office	ASTAL Control Management 1 D	Lincoln Property	Faron Factoria de la companya della companya della companya de la companya della			00044	0040
DEFIESOS ONICE CELIEI	OTRCE	AEW Capital Management, L.P.	Company	4520 East West Hwy	Bethesda	MD	20814	į ZUTU
Inthonds Disco (	Office	Delbanda Diana t instead David amilia	Polinger Shannon &	7700 18/1	n.u	i.	20044	2012, 2011, 200
Bethesda Place I Bethesda Place II	Office	Bethesda Place Limited Partnership	įLuchs	7700 Wisconsin Ave	Bethesda	MD.		2014, 2012
Seriesda Piace II	Olice	Polinger Shannon & Luchs	U.S. Fish and Wildlife	7600 Wisconsin Avenue	Bethesda	MD	ZU014	2014, 2012
Blackwater NWR Administrative Offices	Office	U.S. Fish and Wildlife Service	1	. A. A. C. Land Mark Parker	lo-state a	MD	20042	0040
DISCAWATEL 1444K MORIFISCATIVE Offices	CIRCH	U.S. FISH ARD YVBOIRE SERVICE	Service Foulger-Pratt	2145 Key Wallace Drive	Cambridge	NU	20613	ZUIZ
Stantownii i	Office	Foulger-Pratt Management, Inc.		9601 Blackwell Road	Rockville	MD	20850	10000
<u> Blair East</u>	Multifamily Housing	The Tower Companies	Management, Inc.	1220 E West Hwy	Silver Spring	MD	20910	
Bar House		The Tower Companies The Tower Companies	an (com any 🖥 quari-granistrip dis di sprimis i franch afari-attribé			MD		
par nouse Blair Plaza	Multifamily Housing	The Tower Companies The Tower Companies	n dina la de minera de describación de la contra del la contra de la contra de la contra del la contra del la contra de la contra del la	18201 16th Street	Sliver Spring		20910 20910	12014
Snk Branch/Eliiott Road/MD/Site #C392	Multifamily Housing	PNC Bank	and countries and the second s	1401 Blair Mill Road 8233 ELLIOTT RD	Silver Spring EASTON	MD	21601	32014 10523
DIK DIBIICIVEIIOU ROBU/MU/SILE #C392	Bank Branch	PINC DAIR		10233 ELLIU11 KD	HAVRE DE	MI	121001	<del>-{2014</del>
Tale Dynamic Marine de Communité D'Oble d'Occup	Bank Branch	PNC Bank		ina si un alguarati ar	4	MD	04070	innir.
3nk Branch/Havre de Grace/MD/Site #C308 3nk Branch/Mariboro Road/MD/Site #C393	Bank Branch	PNC Bank IPNC Bank	regiens of months with market miles of the rise.	1238 N WASHINGTON ST	GRACE EASTON	MD.	21078 21601	12015
DIK BIBICIVMBIDOTO ROBOTNU/Site #C393	. Joann Dranch	PANA DESIN	ilangi fanisalahan kanalahan milian	TU4 MARLBURU AVE	EASIUN	MU	121001	12U14
Bink Branch/Rogers Ave/MD/Site #C682	Bank Branch	PNC Bank	į	8593 BALTIMORE NATIONAL PIKE	ELLICOTT CITY		21043	onse
Bnk Branch/SNOW HILL/MD/Site #C220	Bank Branch	PNC Bank	ui escais, Economica ministrativamente mante su escais que de la competita del competita de la competita de la	1309 N WASHINGTON ST	SNOW HILL	MD	21863	
DIK PISHCINGNOW HILD WIDISHS #C220	Dank Digital	LLAC DON	eimelő <del>for íszkele emlek árannen</del>	1909 IA AAWOUNG LON 91	PUOM HIT	IND	21003	150 to
Onk Dranch/Cudlemville/MO/Cite #C386	Bank Branch	PNC Bank	•	103 MAIN STREET	SUDLERSVILLE	MD	24660	2015, 2013
Bnk Branch/Sudlersville/MD/Site #C386	Dalk Didkul	ETTEL DEITE	Buchanan Properties.	1 109 MUIN 91 MEE!	POLITEROVILLE	IMI	21000	[2013, 2013
Bowie Corporate Center	Office	Bowie Corporate Center Limited Partnership	LLC	4321 Collington Road	Bowle	MD	20716.	inno
Brown's Wharf, LLC/1615 Thames Street	Office	Brown's Wharf, LLC	Cassidy Turley	11615 Tharnes Street	Ballmore	MD	21231	
Didant's Aviign, CLC/1010 Thaines direct	wind Commission of the Commiss	Spinistranial receiption business of the simple of the second sec	Remington Hotel	1 IO 13 11 ISSUES OFFICE	Linthicum	INIT.		SAIR THE STATE OF THE SERVICE
Bwi-Springhill Suites BWI	Hotel	Ashford Hospitality Trust	Corporation	899 Elkridge-Landing Rd	Heights	MD	21090	2007
CALVERTON I	Office	Brandywine Calverton LLC	Colhoranou	111700 BELTSVILLE DRIVE	BELTSVILLE	MD		2015, 2014
ALTO A TOTAL OLD A CONTRACTOR CONTRACTOR AND A CONTRACTOR	-ingenieronen dientimeterane	PIGITA ANTEC OCIACIONI EFO	ndra tautum s 🏜 ka sutu tau sainut ay bum i Lingdon ka busiya pa gunuda i	2 11700 DEL 1041LL DIAYE.	mention of the second	Tiesto.	LAUTON	2014, 2013.
CALVERTON II	Office	Brandywine Calverton LLC	100	11710 BELTSVILLE DRIVE	BELTSVILLE	MD	20705	2011, 2010
CULTURE IN THE STREET OF THE S	in the second	ing transportation in the minimum of the contract of the contr	عنونياس لإنسانياناتاناك أعانيات أويانه	111/10 DET   SAITTE DESAE	DEFLOAIFE	IND	120100	12011, 2010
	•	· ·	1	1.	<b>1</b> ;	1.		2015, 2014,
CALVERTON III	Office	Brandywine Calverton LLC	1	11720 BELTSVILLE DRIVE	BELTSVILLE	MD	20705	4
Section 1991 Williams of the section	- Cilling	and to a mine of construction of the construct	بعين غيزه لاطار المتحدث عرسه والمواسنية والأوطارة وجعنيف ضائحه والمجاولة واستنتها	118 EV CELL I OVILLE. LIVIVE	Fire I O A Here	122		2014, 2013,
			.1		i i	ł	İ.	2012, 2011,
			*	200	ł.	1	1	2010, 2009,
	k		Transwestern	**	<u> </u>	ł	Ţ.	2007, 2006,
Capital Gateway I	Office	TIAA-CREF	Commercial Services	6700 Rockledge Drive	Bethesda	MD	20817	2004, 2003
and the second s		અન્યું એ કે કે કાર્ય કર્યા છે. જે જે જે જે જે જે જે જે જે જે જે જે જે	Somerset County	erikenteeringi tari tariminta pirika merikan merikan persenin sahan merikan mengan mengan mengan mengan mengan Pangan terupakan mengan mengan mengan mengan mengan pengan pengan pengan mengan	thirtemy foliage that the said foliage in contrast of	· <del> </del>		A STATE OF THE PERSON ASSESSED.
Carter G. Woodson Elementary School	K-12 School	Somerset County Public Schools	Public Schools	281 Woodson School Road	Crisfield	MD	21817	2011, 2010
Centreville Elementary School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	213 Homewood Avenue	Centreville	MD	21617	
Centreville Middle School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	231 Ruthsburg Road	Centreville	MD	21617	
Bother to the complete and the complete comment of the complete co	- infrare mark marketin marketin	de la resistante de la companione de la minima de la minima de la minima de la companione d	incommentation and the same and property of the same	al granterio estra de princia de como gales de la como de como de como de como de como de como de como de como		1	·	2014, 2013,
	ľ	JBG/BC Chase Tower, L.P. c/o JBG/Commercial		् <del>दे</del>	į.		Ĩ.	2012, 2011,
Chase Tower Office - 4445 Willard Avenue	Office	Management, L.L.C.		4445 Willard Avenue	Chevy Chase	MD	20815	2010, 2009
	منا من المستواد المنابع المناب	ma afrancia cantifera se se se mana de la companio del la companio del la companio del la companio de la companio de la companio de la companio de la companio de la companio de la companio de la companio de la compan	Queen Anne's County	ing of the state o				-
Chesapeake Bay Exploration Center	Office	Queen Anne's County Dept of Public Works	Dept of Public Works	425 Pinev Narrows Rd	Chester	MD	1	2008



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's inc	7125 DEMOCRACY BLVD	BETHESDA -	MD	20817	2013
Chesapeake Bay Foundation Philip Memili		1	Chesapeake Bay					
Center	Office	Chesapeake Bay Foundation	Foundation	6 Herndon Avenue	Annapolis	MD.		2008, 2006
Chevy Chase Building	Other	Polinger Shannon & Luchs		5530 Wisconsin Avenue	Chevy Chase	MD		2014
Church Hill Elementary School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	631 Main Street	Church Hill	MD		2008
City of Baltimore - City Hall	Office	City of Baltimore	City of Baltimore	100 Holliday Street	Baltimore	MD		2005
City of Baltimore - Guilford Building	Office	City of Baltimore	City of Baltimore	206 North Guilford	Baltimore	MD		2005
City of Baltimore - People's Court	Office	City of Baltimore	City of Baltimore	501 E. Fayette Street	Baltimore	MO	21201	2005
and a special way was a series and a series of the series	Apdrinists it vited to this total vite aby the by institution confined under 3	de i streftlite somme perdunt esteramptuni didipetat nduptat instangs pia priping i deleme i umphungs di demenis summan becesari um L	Clark Office Building	7500 Old Georgetown Rd	***		1	1
Clark Office Building	Office	Clark Office Building LLC	iuc	16th Floor	Bethesda	MD.	20814	2011
غي <del>در در del>	Erneidrich vormander zuscher zijdel betraistel bereiten der besteht in der besteht der bes	Martin reporting to destroy the date is also as prophetically to independent in the model and independent of the constraint and the prophetical independent of the constraint and the constraint of the constraint	Caroline County Public	ing ing beliam digitaria (danan inamin'ny) tarahinintry na damin'ny romanena esimilan esy are manta baharakani E	1	P.	1	
Colonel Richardson School Complex	K-12 School	Caroline County Public Schools	Schools	25320 Richardson Road	Federalsburg	MD	21632	2012, 2010
Columbia Corporate Park 2	Office	Merritt Properties, LLC	Merritt Properties, LLC	8840 Stanford Blvd	Columbia	MD	21045	2010, 2008
A three was a second of the control	i animpiralisti i ali anima matini anima di i	el demande meter alle meter en en este e de color de colo	Marriott International.	de servicio de la company de l	***************************************	1	- francisco	1
Columbia Courtyard	Hotel	Marriott international, Inc.	inc.	8910 Stanford Blvd	Columbia	MD	21045	2006
atter the state of	njinaan pagiganji kan ingeresa ingeresa ji pigan pagiga na pagagani aranjari B	and the second of the second s	Marriott international,	idigi sa tuar edu kuli nedu haba karikatukata kunyun sa tuna nedik sahija Ab i intagisalah kepumunti i unterj T	****	·	1	
Columbia Residence Inn	Hotel	Marriott International, Inc.	inc.	4950 Beaver Run Rd	Columbia	MD	21043	2006
The second secon		g to make septiate or the section of the bits the state of the section of the sec		A CONTRACTOR OF THE PARTY OF TH	terral distribution of the same	-	-	2014, 2012,
Columbia, MD	Retail Store	Verizon Wireless		9021 SNOWDEN SQUARE DR STE A	COLUMBIA	MD .	21046	2010, 2009
Country Inn and Suites - Annapolis	Hotel	Country Inn and Suites	ومهاره ومناه والمتاريخ والمتاريخ والمتاريخ والمتاريخ والمتاريخ	2600 Housley Rd.	Annapolis	MD	21401	
CP - Barlow Building	Medical Office	Carr Properties	Carr Properties	5454 Wisconsin Ave	Chevy Chase	MD		2013, 2012
CL - Dation Drillono	Inferior Office	Train and an individual and interest and interest in the contract of the contr	Somerset County	10404 AARCOURUS WAG	CHAN CHAR	INC	120013	CUIO, EUIE
Philippedistricture of the second sec		On a second Occupate On the Cabanda	Public Schools	210 block Comment Assessed	Cristield	MD	24047	2011, 2010
Cristield High School	K-12 School	Somerset County Public Schools	David S. Brown	210 North Somerset Avenue	Trigisió	- IAITA	121011	2011, 2010
		n (16 n 6 1 . 1 . 1 . 1 . 1		700 D. ( D )	O-1 488-	MD	21117	2044
David S, Brown 700 Red Brook	Office	David S. Brown Enterprises, Ltd	Enterprises, Ltd	700 Red Brook	Owings Mills	IVIL	121111	ZU11
			Somerset County		1		2004	2014 2010
Deal Island Elementary School	K-12 School	Somerset County Public Schools	Public Schools	23275 Loia Wheatley Road	Deal Island	MD	21821	2011, 2010
	1		Cassidy & Pinkard	1	<b>1</b>			2014, 2013,
Democracy Center 1 - 6901 Rockledge Dr	Office	Democracy Associates Limited Partnership	Colliers	16901 Rockledge Drive	Bethesda	MD.	20817	2012, 2011
Democracy Center II	Office	Prudential Real Estate Investors	Cassidy Turley	16903 Rockledge Drive	Bethesda	MD.	12081/	2012
			Cassidy & Pinkard			ł	1	
Democracy Center III - 6905 Rockledge Dr	Office	Democracy Associates Limited Partnership	Colliers	6905 Rockledge Drive	Bethesda	MD	20817	2014, 2013, 2012
			Caroline County Public			1		
Denton Elementary School	K-12 School	Caroline County Public Schools	Schools	303 Sharp Road	Denton	MD	21629	2012, 2010
	Î		Queen Anne's County	,		1	1	
	j.		Dept of Parks and	*	i.			
Department of Parks and Recreation	Office	Queen Anne's County Dept of Parks and Recreation	Recreation	1945 4-H Park Rd	Centreville	MD	21617	2008
						1.		
a;	į.		Discovery		ľ.	1		2013, 2012,
Discovery World Headquarters	Office	Discovery Communications	Communications	One Discovery Place	Sliver Spring	MD	20910	2010, 2009, 2008
Dulaney Center I	Office	Guardian Realty Management, Inc.		849 Fairmount Avenue	Towson	MD	21286	2013
Banasas farmatanas das s <u>i an manafarla no per</u> vida <del>Marut</del> aldis avestinidiri bira la vide depi vecioni verminati depart	into a the control of the second by constraint and population of the	in de statement and the statement of the	· ·		1	F	1	2014, 2013,
Element Fleet Mangement	Office	Element Fleet Management	Pinkard Properties LLC	940 Ridgebrook Road	Sparks	MD	21152	2012, 2010
ẫ <del>ỗ nhi trans tha tha con a ghi tha tha thi dia a tha thin thin thin thin thin thin thin thin</del>	Aprilia dispray tanàna mandritry dia mandrit	rid. His of entimizine Liministriki infrastincija en meter bioteran ocionefetet a col-as strij, davit as igratig an dram tripent (	Ene Insurance	T. T. Series series (1984) in the contract of the series of the extensive series of the series of the series of the Series series of the serie	1.	1.	[	-
Erie Insurance, Hagerstown Claims Office	Office	Erie Insurance Company	Company	18544 Breeze Hill Road	Hagerstown	MD	21742	2012
	anning anisis in his anning managemen	ું કું <del>કર્મોક તે તેલે કર લાકોલે લાકાર તે કેશેન કિલ્</del> લાન કું કું કું માન કર્માં કું કું કું કું કું કું કું કું કું કુ	Caroline County Public	يان مان مان المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة المناطقة ال	minimum and and and and and and and and and and			- Bartistan an antitana.
Federalsburg Elementary School	K-12 School	Caroline County Public Schools	Schools	302 South University Avenue	Federalsburg	MD	21632	2012, 2010
A the state of the	Supermarket/Grocery	kaj provinski si kaj kreistrik di filozofiski miratori i kaj prili sepremi produnga en esperante premi se esperante produce de la superante produce della superante produce de la superante produce della superante produce de		And the state of the spinish state of the st	en veries de la constanta de l		confirminate	
FL 0784	Store	FOODLIONCORP	FOODLIONCORP	45315 Alton Lane	California	MD	20619	2012
Antonio production and the state of the stat	رية المرابعة br>المرابعة المرابعة ال	ر به در در در در در در در در در در در در در	in and particular and the second seco	principal commence and the second second second second second second second second second second second second	Line and the second second second second second second second second second second second second second second			ilana, Alaimanaa aa aa aa a



71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
derest series from the contract of the contrac	Supermarket/Grocery	گۆرمىيەردىن دېستۇرىما بورنىدىرى بويىدىن دېزىن ئولۇرىۋىيى بويىدىرى ئېزىن بويىنىدىدىن يىسىمىيىنى دېدىدىدار ئىدىد دېرىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدى	er, til verkerter i fårment er pgevik sjonen skolmet sid en stelme seden se	en aggint for the hospital and aggress and aggress and aggress of an adding subfactions of the same by 4 and preparation	an an and the state and dispersion to the state of parties were	gam <del>ara</del> 1	1	and the state of t
L 1474	Store	FOODLIONCORP	FOODLIONCORP	8741 Piney Orchard Pkwy	Odenton	MD	21113	2012
	Supermarket/Grocery							
<u>L 2501</u>	Store	FOODLIONCORP	FOODLIONCORP	8300 Ice Crystal Dr	Scaggsville	MO	20723	2012
FL 2606	Supermarket/Grocery Store	FOODLIONCORP	roopi loncopp	11760 HG Trueman Rd	<b></b>	MD	20657	2013
T 5000	Supermarket/Grocery	I POOLIONOUR.	FOODLIONCORP	111700 TIG. HEATERS TO THE THE THE THE THE THE THE THE THE THE	Lusby	Jun-	120001	[2012
L# 0246	Slore	FOODLIONCORP	FOODLIONCORP	11801 Coastal Hwy	Ocean City	MD.	21842	2005
ar and the second secon	Supermarkel/Grocery	The second section of the second seco	A CONTRACTOR OF THE PROPERTY O	an tagin an and in terminal state of the control of			1	faria di manana di di di di di di di di di di di di di
L# 0397	Store	FOODLIONCORP	FOODLIONCORP	Rt 50 & Hwy 611	Ocean City	MD	21842	2005
<u>1995) 199 кария 1991 — Торой с</u> Серен <del>овий Сумаруна (умаруна) россий органи</del> до умаро (ум. метро (ум. 1816) 1995 1995 — Сумария 1996 — Сумария 1996 — Сумария Сумаруна (ум. 1996) 1996 — Сумария (ум. 1996) 1996	Supermarket/Grocery	Applying to me accessing a method to the state of the sta	an en erine entres (enteres Leutstrough) (1774) (1774) ja eine en estas sec	شراب ألقو فينهونه و فيهيش بدغته و الوشاقة وجهه جود ورييس هيوه كشفه سؤة عهجو كرام يسيده المستعين س	and the state of t	1	erige stronge stronge stronge St.	g games of a series and a series and a series and a series and a series and a series and a series and a series a
L# 0658	Store	FOODLIONCORP	FOODLIONCORP	10126 Old Ocean City Blvd	Berlin	MO	21811	2005
	Supermarket/Grocery							
-L# 0786 <del>(1908-1917-1918-1917-1918-1918-1918-1918-191</del>	Store	FOODLIONCORP	FOODLIONCORP	10 Village Center Rd	Reisterstown	MD	21136	12005
FL# 0800	Supermarket/Grocery Store	FOODLIONCORP	FOODLIONCORP	Snow Hill Road/regency Dr	Collabora	MD	21801	innae
- F-B- AGAA	Supermarket/Grocery	a POOLIUNOURP	POUDLIUNCORP	solow us rosousedelick Di	Salisbury	IND.	ZIOUI	12000
FL# 1153	Store	FOODLIONCORP	FOODLIONCORP	12158 Brittingham Lane	Princess Anne	MD	21853	2005
tarang dan armang maken-talahan dan kanang pada kahan daran daran daran daran daran daran daran sa kanan daran	Supermarket/Grocery	2	A CONTRACTOR OF THE PROPERTY O	The state of the s	marant meritari generali senerali pata mende de	1	1	garante garante anno
L#.1158	Store	FOODLIONCORP	FOODLIONCORP	6 Washington Street	Cambridge	MD	21613	2005
i anni anni mana i bi'ann ann a milian i ann a bh aithe i anni a' annin i inn an a Sineangar a ri inn an a mil	Supermarket/Grocery	ng ficket) pingka frakan pekrisai gang fembapasanal perak dara bergafa espiti benda (diseb) pingka perak pang sakanad belamad Perak dara pendangan pendangan pendangan sanal pendalan bergapa pendangan pendangan pendangan bendas belamad Pendangan pendangan	ta) perioniqui dell'asferiri di la rico i all'alesti i di una dia di all'alesti.	dia da iliga diga ma tidan di iliga qui em 1900 per i proper de me e depute diferente de ante e e emente e ante e e e e e e e e e e e e e e e e e e		1	-	
FL# 1168	Store	FOODLIONCORP	FOODLIONCORP	100 Drury Lane Laplata Vi	LA Plata	MD	20646	2005
The second secon	Supermarket/Grocery			-		1	1	
FL# 1184	Store	FOODLIONCORP	FOODLIONCORP	3200 Old Washington Road	Waldorf	IMO	20602	2005
FL# 1210	Supermarket/Grocery Store	EOODLIONCORP	FOODLIONCORP	19 St. Mary's Square	Lexington Park	MD	20653	2005
The International state of the second state of the second	Supermarket/Grocery	Encorrious productions of the contract of the	LOOPIONOOUL	113 OF Mail A 2 Octobre	COMMUNICATION.	tair.	- Exposo	\$ CONTRACTOR OF THE PROPERTY O
FL# 1211	Store	FOODLIONCORP	FOODLIONCORP	1216 Quantico Rd.	Salisbury	MD	21801	2005
<del>tina vit samba ji jakini di</del> tua dauta dauta dauta mana umuna yeriri danda alur bija p <del>agayan dipuna daidhees</del> tibudunaya a mir ya	Supermarket/Grocery	de trans al-hannel as a registration of an illustration to be presented beautiful to be not be a city in more discovered.	Desire to the second of the second second second second					
FL# 1216	Store	FOODLIONCORP	FOODLIONCORP	Hwy 15 & Tippin_drive	Thurmont	MD	21788	2009
s <u>ar inn sa dalam uning</u> i <del>yi kurasidi wa iya nai</del> n angbay ina filikisidi naban da is isa na bada garib da sa i (a 464).	Supermarket/Grocery	ing to endowers have been provided in a familiar firm you had been been been to be the been been been able to the second beautiful to be been been been been been been been	Characteristic and an assessment of the second seco	to and the second of proper territory and a second of the company with the company of the compan	1	1	Ī	
FL# 1238	Store	FOODLIONCORP	FOODLIONCORP	11800 Old National Pike	New Market	MD	21774	2005
	Supermarket/Grocery						1	1
FL# 1268	Store	FOODLINCORP	FOODLIONCORP	Us Rt. 50/highman Rd	Salisbury	MD_	21801	2005
FL# 1289	Supermarket/Grocery Store	FOODLIONCORP	FOODLIONCORP	219 Mariboro Ave	Easton	MD	21601	200E
The state of the s	Supermarket/Grocery	A LOOP ION CORL	POULIUNCORP	* 1 A MGI #0010 WAR		IND.	121001	(2000)
FL#.1297	Store	FOODLIONCORP	FOODLIONCORP	Md. Rt 313 @ Bloomingdale	Federalsburg	MD	21632	2005
the state of the s	Supermarket/Grocery	age upadig kang ta adapa manahan adapa manahan manahan sa kaban sa kama cara raman manahan kabibibi kabibi kaban A kapan panta adapa a a amama a	and the state of t	Anni Marian de Caracia	····	1		- managaran da da da da da da da da da da da da da
FL# 1313	Store	FOODLIONCORP	FOODLIONCORP	Us Route 50/301 @ Thomp's	Stevensville	MD	21666	2005
e, a samen lan siere e samen i de 1 april nichter en en een fanne en person en person gewone ee eeu gest ferfer ferren.	Supermarkel/Grocery	reag construct que e que e agres en spas qui que e à light dança cide dimensadament unades levador il la 7 m seu real des réactes le sand étable de seu sei dévallaires.	ramenta i es racido propues pleada espanolicia parenida escaparal esc	And the state of t	***************************************	1	1.	\$ 
FL# 1315	Store	FOODLIONCORP	FOODLIONCORP	3261 Solomons Island Rd,	Edgewater	MD	21037	12005
A SECTION ASSESSMENT TO THE TRANSPORT OF	Supermarket/Grocery			•		1		
FL# 1319	Store	FOODLIONCORP	FOODLIONCORP	130290 ML Wolf Rd	Charlotte Hall	MD.	20622	12005
FL# 1324	Supermarkel/Grocery Store	FOODLIONCORP	FOODLIONCORP	6375 Monroe Avenue	Eldersburg	MD	21784	2005
E. L. P. L. C.	Supermarket/Grocery	africanting research of the sequence of the research of the section of the sectio	POUDLIUNCURP	6375 Monroe Avenue	Eligipani	NO.	61/04	12000
FL# 1328	Store	FOODLIONCORP	FOODLIONCORP	9910 Liberty Rd.	Randalistown	MD	21133	2005



71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
in the same of the street of the same that the same is the same of the same that the same that the same the same the same that t	Supermarket/Grocery	de la company de						
<u>L# 1363</u>	Store	FOODLIONCORP	FOODLIONCORP	2500 West Pulasky Hwy	North East	MD	21901	2009
	Supermarket/Grocery		İ					
L# 1387	Store	FOODLIONCORP	FOODLIONCORP	12100 Central Ave.	Mitchellville	MD	20721	2009
	Supermarkel/Grocery	Transi in income	1	lorge the table	0 4-1		24400	lacar
FL# 1412	Store Supermarke/Grocery	FOODLIONCORP	FOODLIONCORP	8508 Liberty Road	Randallstown	MD	21133	12005
FL# 1413	Store	FOODLIONCORP	FOODLIONCORP	8635 Walther Blvd	Perry Hall	MD	21236	2005
properties to the second secon	Supermarke/Grocery	Luginassa menmenjih di anggenapun dalampusamentan menempuntun menempuntun pintan pendispendis TA OODETOLAOOLA.	- ILOOPTONOOU	1000 AASIRIST DIAG	CONTRIBE	IND.	121230	
TL# 1414	Store	FOODLIONCORP	FOODLIONCORP	9500 Se Crain Hwy	Upper Marlboro	MD	20772	2005
<del>r productive (de de proven</del> s) <del>a da papa p</del> er fore de selección de la consecue de servicio de sesta de diferencias antenes al consecuencias. La consecuencia	Supermarket/Grocery	and the state of t		dan oli yaki asunga pada katagan na pingan ang kalangan na mangan na matagan ancasa da makan m Bangan na mangan na	- Charleston bridge for the first of the fir		******	
# 1423	Store	FOODLIONCORP	FOODLIONCORP	2458 Churchville Rd	BEL AIR	MO	21015	2005
<u> 1887 il 1883 in Language an Malayan in Marya (1887) an 1884 in 1893 ann 1887 an 1887 an 1889 in 1887 ann 188</u>	Supermarket/Grocery	and the second s	in this series of the first of the series of	many the second day make the second day and the second day and the second day and the second day and the second	Solomon's	i: Livaselere	1	***************************************
FL# 1443	Store	FOODLIONCORP	FOODLIONCORP	13300 Hg Truman Road	island	MD	20629	2005
	Supermarket/Grocery				i			
	Store	FOODLIONCORP	FOODLIONCORP	1312 S. Main St Suite 4	Mount Airy	MD	21771	2005
W. W. 2000	Supermarket/Grocery		1		i		00070	-
FL# 1526	Store Supermarkel/Grocery	FOODLIONCORP	FOODLIONCORP	750 Prince Frederick Blvd	Prince Frederick	MU	20678	2005
EL# 4500	Store	FOODLIONCORP	FOODLJONCORP.	16551 Waterloo Rd	Elkridge	MD	21075	2005
	Supermarket/Grocery	LEGANISTICAL STATES STATES AND ST	- Indopposition	DA CORRESPONDE CANADA CONTRACTOR DE CORRESPONDE DE	CRINGE	INIU	121015	12000
FL# 1535	Store	FOODLIONCORP	FOODLIONCORP	5715 Crain Hwy	Upper Mariboro	MD	20772	2005
Marie and Millian and Millian and Millian and Millian San San San San San San San San San S	Supermarket/Grocery		SI CODLIGIOUS	Control of the contro	Sppor Horizono		120112	Europe burning
FL#.1547	Store	FOODLIONCORP	FOODLIONCORP	2250 Hanson Rd	Edgewood	MD	21040	2005
este erikinik <del>kasaling pali ketapahan daya</del> ing bagsa unipa gipang pilopin di bili ahadi pala pangbiban sabisahinin bilah	Supermarket/Grocery	and and desired and the state of the state o	minter market in the property of the property	angangalana na amatasta nganda spanjatia initi ya nata dina talamatin dana da talaban, ti talaman 1944 a talab Barangan na amatan n	or and the resident of the second of the resident	-	******************	4 . # # ** *** *** ** ** *** ** *** *** *
FL# 1549	Store	FOODLIONCORP	FOODLIONCORP	15300 McMullen Hwy Sw	Cumberland	MD	21502	2008
ф <del>Соло заражения (Переме), произодый на Соло (1984 року на Соло Соло Соло Соло Соло Соло Соло Сол</del>	Supermarket/Grocery	all providents or or or or or or or or or or or or or		\$ 100 mm ( 1		]		1
FL# 1558	Store	FOODLIONCORP	FOODLIONCORP	1001 East Pulaski Hwy	Elkton	MD	21921	2005
	Supermarket/Grocery						1	1
FL# 1580	Store	FOODLIONCORP	FOODLIONCORP	206 N, Fruitland Blvd	Fruitand	MD	21826	2005
C1 # 4004	Supermarket/Grocery	FOARLIONAGRA	TOOD! INIOOD	1400 Ourstand DJ	Cashaumilla		21030	2005
FL# 1664	Store Supermarket/Grocery	FOODLIONCORP	FOODLIONCORP	122 Cranbrook Rd	Cockeysville	MD	121030	12003
FL# 2515	Store	FOODLIONCORP	FOODLIONCORP	20995 Point Lookout Rd	Callaway	MD	20620	2005
FIL SO 19	Supermarket/Grocery	i de CONTIONOUS.	LOOPTOMOOUL	TEO220 LORK FORMATION TO THE STATE OF THE ST	- in in the second	11811	120020	1
FL# 2522	Store	FOODLIONCORP	FOODLIONCORP	2466 Centreville Road	Centerville	MD	21617	2005
<del>ties talente es tras est en ales remines incres relevanteix incres relevantes tras tras en en esta esta esta en</del> La companyación	Supermarke//Grocery	Safferd & Charles and Safe and Safe and Safe and Administration of the safe and a formal process determinent and safe and a fact of physical safe and a sa		ayan figura yafigadi yagiling bashi fini ngi ngi ngi ngi ngi ngi ngi ngangan abanda da makhidi n tantaf na bada	enem saukinder eitstäjä sianjaakin ryhal et eenen alaensti	***************************************	1	ndje mara i ka didira k kudakan maraidi yilar an
FL# 2535	Store	FOODLIONCORP	FOODLIONCORP	9251 Lakeside Blvd	Owings Mill	MD	21117	2005
A CANADA CANADA TANDA TANDA NA MANAGA BANDA SA MANAGA MANAGA NA MARANA NA A SA BANDA CAMBANA SA MASA SANDA	Supermarket/Grocery				41.500		T	
FL# 2547	Store	FOODLIONCORP	FOODLIONCORP	242 West Smallwood DR	Waldorf	MD	20603	2005
	Supermarket/Grocery						1	lane
FL# 2559	Store	FOODLIONCORP	FOODLIONCORP	7069 Bitmore Angolis Blvd	Lithicum	MD	21061	12005
Tr. # prop	Supermarket/Grocery	FOOD JOUGARD	FOOD IONOGES	TEAR NEW DOLL OR	Edanman	140	24240	2005
FL# 2560	Store	FOODLINCORP	FOODLIONCORP	7514 North Point RD	Edgemere	MD_	21219	2000
E1 # 2507	Supermarket/Grocery	FOODLIONCORP	COOR IONGOOD	140 Englar Dd	Mactonhartes	MD	21157	2010
FL# 2587	Store Supermarket/Grocery	LACONTONACIONE	FOODLIONCORP	140 Englar Rd	Westminster	fini.	12110	EU IU
FL#2598	Store	FOODLIONCORP	FOODLIONCORP	5896 Robert Oliver Place	Columbia	MD	1	2008



(71033A) MONTGOMERY MALL		May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
FL# 2911	Supermarket/Grocery Store	FOODLIONCORP	FOODLIONCORP	16567 S. Fræderick Rd	Gaithersburg	MD	20877	2010
EL#0656	Supermarket/Grocery Store	FOODLIONCORP	FOODLIONCORP	40955 Merchant Lane	Leonardtown	MD	20650	2005
FL#0950	Supermarket/Grocery Store	FOODLIONCORP	FOODLIONCORP	511 East Baitimore St	Taneytown	MD	21787	2005
Marketon a fallow to a province of the construction and to the stand of the stand o	Supermarket/Grocery	કું તું મુક્ત કહેલ સામાન સામાં કુલ ૧ માના મુંત લેવા પ્રાથમિક પ્રથમિક મુંત ના મુંત કુલ છે. તું કુલ માતા મુંત માના મા	a jan errijane spiriene spiranerije de santoningen er en jedanes jan en granerije.	e Annie von Anne en eingebend gegen eine mit der eine von geben ein geber ein den gebeld in der gegen eine ein gegen ein der der ein gegen ein der gegen ein der gegen ein der gegen ein der gegen ein der gegen ein der gegen ein der gegen gegen ein der gegen ein der gegen gegen ein der gegen gegen ein der gegen gegen gegen gegen ein der gegen	*	la eriran kalendiya eri  -  -	ya gari siy ajimin a bada	kaning kangkang pembang kanggang berakan perin
FL#1668	Store Supermarket/Grocery	FOODLIONCORP	FOODLIONCORP	350 Mountain Road	Pasadena		21122	Annual Secret Color of Secretary Secretary (Secretary
FL#2517	Store	FOODLIONCORP	FOODLIONCORP	2655 Annapolis Road (Rt 175)	Hanover DISTRICT	MD	21076	2005
FORESTVILLE (1897) FORESTVILLE, MO-1951 - jcp	Retail Store	Target Corporation JCPenney	Target Corporation JCPenney	3101 DONNELL DR 3401 DONNELL DR	HEIGHTS FORESTVILLE	MD MD	20747 20747	2010 2012
A TELEVISION OF THE PERSON OF	Office	American Real Estate Partners	American Real Estate	805 King Farm Boulevard	Rockville	MD	Processor for Announced E	2013, 2011
Four Irvington Centre	A desired to the contract of t	Sandan datas njana na dasam madi usquaya majurus garin data pipira supirati jiha rahati ugan jajini takat sibisan datain ta	Lincoln Property	and the state of t	alla piete elektronomie, nom att kolomen sied ten om an		***************************************	
Four Owings Mills Corporate Center	Office	Bel Carrol / Bel Calvert LLC,	Company Wells REIT II - 80 M	10453 Mill Run Circle	Owings Mills	MD	21117	Marie Care Marie M
Franklin Center	Office	Wells Real Estate Funds	Street, LLC Frederick County	6841 Benjamin Franklin Dr	Columbia	MD	21046	2012, 2010
Frederick County Health Department	Office	Board of County Commissioner of Frederick Maryland	Maintenance Department	350 Monteveue Lane	Frederick	MD	21702	2011
Fruitland Intermediate School	K-12 School	Wicomico County Board of Education	Wicomico County Board of Education	208 W. Maint St.	Fruitand	MD	21826	2012, 2011
Fruilland Primary School	K-12 School	Wicomico County Board of Education	Wicomico County Board of Education	301 N. Division St.	Fruitland	MD	21826	2011
Gaithersburg SpringHill Suites	Hotel	Marriott International, Inc.	Marriott International,	9715 Washintonian Blyd	Gaithersburg	MD	20878	2006
Gaithersburg Washingtonian Center Courtyard	Hotel	Marriott International, Inc.	Marriott Courtyard - Gaithersburg Washingtonian Center	204 Boardwalk Place	Gaithersburg	MD	20878	2008
GAITHERSBURG, MD-0273	Retail Store	JCPenney		701 RUSSELL AVE	GAITHERSBUR G	MD	20877	2014
Garden Plaza	Office	Garden Plaza LLC	Transwestern Gateway	7700 Old Georgetown Rd.	bethesda	MD	20814	2015
Gateway Tower	Office	Transwestern Gateway LLC	LLC	401 North Washington ST.	Rockville	MD	20850	2005
Glant Eagle 1841 Waverly	Supermarkel/Grocery Store	Giant Eagle, Inc.	Giant Eagle, Inc.	1275 West Patrick Street	Frederick	MD	21702	2011, 2008
Giant Eagle 1842 West 7th Street	Supermarket/Grocery Store	Giant Eagle, Inc.	Glant Eagle, Inc.	1305 West 7th Street	Frederick	MD	21701	2008
Glascock Building GLENBURNIE, MD-0786 - jcp	Office Retail Store	James Plasker JCPenney	RECURRENT	5410 Grosvenor Lane 7900 GOVERNOR RITCHIE HWY	Bethesda IGLEN BURNIE	MD MD	20814 21061	12013 12013
Grasonville Elementrary School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	5435 Main Street	Grasonville	MD	21638	
Greenbelt Courtyard	Hotel	Marriolt International, Inc.	Mardott International, Inc.	6301 Golden Triangle Dr	Greenbelt	MD	20770	2006
Greensboro Elementary School	K-12 School	Caroline County Public Schools	Caroline County Public Schools	625 North Main Street	Greensboro	MD	21639	2012, 2010
Greenwood Elementary School	K-12 School	Somerset County Public Schools	Somerset County Public Schools	111412 Dryden Road	Princess Anne	MD	21853	2011, 2010



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MO_	20817	2013
Hampden Square	Office	Azure 14th Street Corporation	Cassidy Turley	4800 Montgomery Lane	Bethesda	MO	20814	2014, 2013, 2012
Harbor East Parcel B-Commercial, LLC	Office	Harbor East Parcel 8-Commercial, LLC	Harbor East Management Group	650 South Exeter Street	Baltimore	MD	21202	2011
Harbor East Parcel C-Commercial, LLC	Office	Harbor East Management Group	Harbor East Management Group	1001 Fleet Street	Baltimore	MO	21202	2012
	<b>~</b> =		Harbor East	400 1-1	0-8	MD	21202	2012
Harbor East Parcel D-Commercial, LLC Health Care Finance Administration	Office	Harbor East Parcel D-Commercial, LLC General Services Administration	Management Group	100 International Dr. 7500 Security Blvd.	Baltimore Baltimore	MD		2000
Holiday Inn Express and Sultes Elkridge	Hotel	Lyndwood Hospitality LLC.	minimal ambientia ambientia	16064 Marshalee Drive	Elkridge	MD		2013
Holiday Itim Express and Suites Entrode	TOOK)	Cyluwoo respically ELC.	Wicomico County	fertigentifer talentiques en pasifer, aftergradate proprime pinge TEMOA MENIOTISME TAIAG	EIVIOAR	- IVIL	121010	12913
James M. Bennett High School	K-12 School	Wicomico County Board of Education	Board of Education	300 E. College Ave.	Sallsbury	MD	21804	2012
	O.C.	JBG/1 Choke Cherry, LLC. c/o JBG/Commercial		One Challe Champ)	Rockville	MD	20850	2015, 2014, 2013, 2012, 2011, 2010, 2009
JBG 1 Choke Cherry LLC	Office	Management L.L.C	The JBG Companies	One Choke Cherry Lane	Rockville MD	- UMI CM	20030	2012, 2011
JBG/ 5 Choke Cherry, LLC	Office	JBG / 5 Choke Cheny LLC	MD Dept. of General	5 Choke Cherry RD	LOCKAINB MD	- IMI	20000	LANTA CALL
Jessup State Complex	Office	MD Dept. of General Services	Services	7275 Waterloo Road	Jessup	MD	20794	2012
JESSUD State Complex	Once	MD nepr of delega services	Queen Anne's County	AND AND INDICATED AND AND AND AND AND AND AND AND AND AN	www.indiamen.	MIN	70134	2012
Kennard Elementary School	K-12 School	Queen Anne's County Public Schools	Public Schools	1420 Little Kidwell Avenue	Centreville	MD	21617	2008
Kmart Oxon Hill, MD	Retail Store	Sears Holdings Corporation	Truelly Schools	16163 Oxon Hill Road	Oxon Hill	MD		2014, 2012
Kmart Salisbury, MD	Retail Store	Sears Holdings Corporation	randa massa duny dipanta basupat di Kathari adputa bigrapa paga patapamat datam tamin	1301 Tilghman Road	Salsbury	MO	21804	2014
Konterra Headquarters	Office	Konterra Realty	Konterra Realty	114401 Sweitzer Lane	Laurel	MO		2014
Lakefront at Washingtonian	Office	The Brick Companies	The Brick Companies	19841 Washingtonlan Blvd	Gaithersburg	MO	20878	2011, 2009
LANHAM, MD-0194	Retail Store	JCPenney	JCPenney	19100 MCHUGH DR STE 576	LANHAM	MD	20706	2012
EVIALISM MEAN 144	Warehouse and	ni quint de la Calendara no con trait incommentament matemateria in mari Al in tradit in trait  Martin Martin Colonia Control Colonia	23 100 MOI 10011 DI OI F 210	ind suites of desire investigation	in the same	450,00	The state of the state of	
Liberty Property Trust, 11841 Newgate Blvd	Storage	Liberty Property Trust	Liberty Property Trust	11841 Newgate Blvd	Hagerstown	MD	21740	2012, 2010
Lockerman Middle School	K-12 School	Caroline County Public Schools	Caroline County Public Schools	410 Lockerman Street	Denton	MD	21629	2012, 2010
Lockheed Martin Corporation	Office	Lockheed Martin Corporation	Lockheed Martin Corporation	6801 Rockledge Drive	Bethesda	MD	20817	2001
F. Comment of the state of the	Warehouse and	a and del distribution in the fact of the second second second second second second second second second second	Cushman & Wakefield	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			1	
LPF 7805 JESSUP, LLC	Storage	LaSalle Investment Management, Inc.	of Maryland	7605 DORSEY RUN ROAD	JESSUP	MD	20794	2013
Lyndwood Executive Bldg 1	Office	MEPT/Kennedy Associates	C8 Richard Ellis	6085 Marshalee Drive	Elkridge	MD	21075	2012, 2011, 2009, 2008, 2007
Lyndwood Executive Bidg 2	Office	MEPT/Kennedy Associates	CB Richard Ellis	6095 Marshalee Drive	Elkridge	MD	21075	2012, 2011, 2009, 2008
TAIMANN EVERTINE DIOR S	- Initia	FARTE I WELLIAM VOORTOR	Somerset County	i kasa saga a saga a saga a saga a saga a saga a saga a saga a saga a saga a saga a saga a saga a saga a saga a Saga a saga	iniminimization in the second	1716	45.00	Tarrett Land
Marion Sarah Peyton School	K-12 School	Somerset County Public Schools	Public Schools	28573 Hudson Comer Road	Marion	MD	21838	2010
Mary Risteau District Court and Multi-Service Center	Courthouse	MD Dept. of General Services	MD Dept. of General Services	2 S Bond Street	Bel Air	MD	21014	2013
Maryland Environmental Service	Office	Maryland Environmental Service	Maryland Environmental Service	259 Najoles Rd	Miliersville	MD	21108	2013, 2011, 2010, 2009
Matapeaka Elementary School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	651 Romacoke Road	Stevensville	MD	21666	2008
Matapeake Middle School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc.	671 Romancoke Road	Stevensville	MD	21666	2008
Metro Park V	Office	PS Business Parks	PS Business Parks	17361 Calhoun Place	Rockville	MD	20855	2012, 2010



71033A) MONTGOMERY MALL	Retail Store	May Company Monigomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
			Lincoln Property				[	L
Metroplex-8401 Corporate	Office	MPLX Landover Co LLC	Company	8401 Corporate Drive	Hyattsville	MD		2009
<u> Wilestone Business Park - Milestone IV - 2601</u>	Office	Milestone Industrial, LC	CB Richard Ellis	12420 Milestone Center Drive		MD		2013
Montgomery Executive Center	Office	Glenborough	Glenborough	6 Montgomery Village Ave.	Gaithersburg	MD	20879	2012
· · · · · · · · · · · · · · · · · · ·		4	1	ř.				2015, 2014,
A 4 4 17	0.55	0-111-4-4-4-11-0	Lincoln Property	Zordak w rama		1		2013, 2011,
Montpeller	Office	Bel Mortbeller LLC	Company	7651 Montpelier Rd	Laurel	MD	20723	2010, 2009
Administration (I	-	Thursday, Co.	<b>Å</b>	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1		20000	2014, 2013,
Montrose Metro II	Office	JBG/Rockville NCI Campus, L.L.C. c/o_JBG/Commercial	in the same of the same of the same of the same of the same of the same of the same of the same of the same of	11919 Rockville Pike	Rockville	MD	20852	2012, 2010
A burtan and offen and who be additional West after Marie	Office		<b>\$</b>	9609 Medical Center Drive	D	MD	annen	0030 0044
National Cancer Institute Rockville	Onice	Management, L.L.C.	Marriott International.	3002 Wedical Ceuter Dire	Rockville	IMD	20850	2015, 2014
Marie Maria III and a me Carrierad	Hotel	i.		1000 Companie De	l amelauan	1	20785	2006
New Carrollton / Landover Courtyard	Liotei	Marriott International, Inc.	Inc. Caroline County Public	8330 Corporate Dr	Landover	MD	ZU/03	I SOND
adia dan Ariansana sadahan Basahana	ilic do Cabard	Cambra Carata Califor California	Schools	1. 10990 River Road	Prida alla	MD	04550	2012
North Carolina High School	K-12 School	Caroline County Public Schools		Section in the Cost of the Cos	Ridgely	IND.	21660	Paris
North Country High Cohoot	( 40 Cabana)	losselles Ossets Dublis Osterst	Caroline County Public	ADDET CONTRACTOR	Alberta.	l.	24000	2010
North Caroline High School	K-12 School	Caroline County Public Schools	Schools	10855 Central Avenue	Ridgely	MD	21660	2010
Torrest of the State of the Sta	1,400,4-1		Wicomico County	t and a		1	10000	
North Sallsbury Elementary School	K-12 School	Wicomico County Board of Education	Board of Education	1213 Emerson Ave.	Salisbury	MD	21801	2012, 2011
D	low.	Additional Book Book Book Book Book Book Book Boo		44000 D. J. W. DY.	<b>I</b>		HARVEN	0044 0045 0044
One Central Plaza	Office	Washington Real Estate Investment Trust		11300 Rockville Pike	Rockville	MD	20852	2014, 2013, 2011
	00	, n	MacKenzie	14044440			04000	1
One Hunt Valley	Office	Baltimore MD Green II, LLC	Management	11311 McCormick Rd.	Cockeysville	MD	21030	2014
One Branch Sackway	Office	Classical Character 18 tout in other Developed College		One Preserve Pkwy.	Dewlarite	MD.	noorn	2012 2010 2011
One Preserve Parkway	Tollice	Boston Properties Washington Regional Office	وذعت أساور بحشيب ويشتب والبذيوة والمعجود الجأباب	TOTAL PIESEIVE PRWY.	Rockville	PORT	20852	2013, 2012, 2011
One Rock Spring, L.P.	Office	Tishman Speyer	Tishman Speyer	6550 Rock Spring Drive	Bethesda	MD .	20817	2012, 2010, 2008
ONE ROCKLEDGE ASSOCIATES	Office	Brandywine Realty Trust	1 igittigit oheket	16600 ROCKLEDGE DRIVE	BETHESDA	MD		2014, 2013
DINE ROUNLEUGE AGGOCIATES	A CHARGE AND AND AND AND AND AND AND AND AND AND	DISHWAN CONTRACTOR CON	ومعتاق والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة والمتابعة	16705 Rockledge Drive	TOE ! DEONY	JAIT.	50011	2014, 2010
One Rockledge Centre	Office	Rockledge Centre Associates, L.P.	Jones Lang LaSalle	Suite 500	Bethesda	MD	20817	2013, 2012
Oue Locklands Celling	an frisionación in principalità Mille	Lucyente ceine vasociana ("L")	ANIBS FOR FOODS	TOTAL TOTAL CONTRACTOR AND A STATE OF THE PROPERTY OF THE PROP	TOCHESTE	100	120011	ANIO SOIS
	1		-		1	1	4	2013, 2012,
	4		Ĭ.	19801 Washingtonian Boulevard	4	1	4	2011, 2010.
One Washingtonian Center	Office	C B.Richard Ellis		Lower Level	Gaithersburg	MD	20878	2009, 2008, 2007
Park Plaza I	Office	Carr Properties		2101 Gaither Rd	Rockville	TMD	20850	2015, 2014
E QIV L. 1050		COUNTY AND CONTRACT C		TAPO I GENERAL STATE OF THE STA	LANARE	100		12010/2017
			Washington Real	Para Para Para Para Para Para Para Para		1	4	1
Parklawn Plaza	Office	Washington Real Estate Investment Trust		11821 Parklawn Drive	Rockville	MD	20852	2009
atriant in the second s	marie propries and a second comme	A STAINING THE PROPERTY OF THE	Wicomico County	11 1021 FOINGER LARC	interior in the second	ستنبئت	LVUVE	-
Pemberton Elementary School	K-12 School	Wicomico County Board of Education	Board of Education	1300 Pemberton Dr.	Salisbury	MD	21801	2012
Parameter Control of the Control of	Emina description of the second	terregist and the control of the second section of the second second second second second second second section of the second second second second second second second second second second second second second second sec	Foulger-Pratt	The state of the s	manih dan janggang Tanana	ing granden in	-	A Company of the Comp
Physicians Office Building II	Office	Foulger-Pratt Management, Inc.	Management, Inc.	18109 Prince Phillips Drive	Olney	MD .	20832	2009
1. 447 Bright of A Bright Carley 11 15 15		dala mendikan mengan kerangan kering pelangga penancenjangan damaterakan keringan dan sebesah dan sebesah dama Sa merudian : 1 septe 1 dan sebilah 1650 40° I IPP	Laster section of the section of the	to the second framework of the second	in a market of the same of the same of the same of the same of the same of the same of the same of the same of		4	- Practical Control of the Control o
Piedmont Pointe I	Office	Piedmont Office Realty Trust	<b>9</b> .	6720-A Rockledge Dr.	Bethesda	MD	20817	2014, 2013, 2012
Pledmont Pointe II	Office	Piedmont Office Really Trust		16720-B Rockledge Dr.	Bethesda	MD		2014
PNC Bank / Centreville, MD / C389	Bank Branch	Barbados Hall LLC	PNC Bank	210 E WATER ST	CENTREVILLE			2012
PNC Bank / Galena, MD / Site #C382	Bank Branch	PNC Bank	PNC Bank	1101 W CROSS ST	GALENA	MD		2012



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC		7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
Preston Elementary School	K-12 School	Caroline County Public Schools	Caroline County Public Schools	225 Main Street	Preston	MD	21655	2012, 2010
Prince St. Elementary School	K-12 School	Wicomico County Board of Education	Wicomico County Board of Education	400 Prince St.	Salisbury	MD	21804	2012, 2011
Queen Anne's County High School	K-12 School	Queen Anne's County Public Schools	Queen Anne's County Public Schools	125 Ruthsburg Road	Centreville	MD	21617	2009
Redland I - 540 Gaither Rd	Office	First Potomac Realty Trust	مـ٥ بـ دومـ الرواقية المراقية المراقية المراقية المراقية المراقية المراقية المراقية المراقية المراقية المراقية المراقية المراقية الم	540 Gaither Road	Rockville	MD		2015
Redland III - 530 Gaither Rd	Office	First Potomac	inneren eta inneli 🎉 inneren en santustrarian en esa en tarran en terran en tarran en	530 Gaither Road	Rockville	MD .	20850	2014
	Warehouse and	المطالبة والمسترين والمستر	n programmy i findricis programmy profession de ser service de la company de la compan	finanti fingus e comite es recivirar d'arbitale é el estado de la comite a paque el se qui F		janiania.	1	
REICO	Storage	Liberty Property Trust		6600 Business Parkway	Elkridge	MD	21075	2015
	i i i i i i i i i i i i i i i i i i i	ىدىدىن ئامارىيى يىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدىدى	gi Annaisen albare in die Erichtschaft auf der euer europeier	g Bans terestida kirin ma terkis nirmetar iti kirin meterini proveterika a nas, mentemoret kina saat.	urbiststejsdynterinnigfymernykuinne,	Jeriministan	1	2015, 2014,
RESEARCH OFFICE CENTER II	Office	Brandywine Research, LLC		2275 RESEARCH BOULEVARD	ROCKVILLE	MD	20850	2012, 2011
RESEARCH OFFICE CENTER III	Office	Brandywine Research, LLC	The state of the s	2273 RESEARCH BOULEVARD	ROCKVILLE	MD	20850	2015
in 1981 in marger and 1 in 2 a marger than 2 december 1875 and interest and in the state of the		a as an all transmits, a tan an atravets is understone even advice that which a solving of the real state and sent serving a serving the serving servi	Caroline County Public	See district control in section of an extension of a state of control of the section of the sect		1	1	
Ridgely Elementary School	K-12 School	†Caroline County Public Schools	Schools	118 North Central Avenue	Ridgely	MD		2012, 2010
Ridges	Office	Washington Real Estate Investment Trust		200 Orchard Ridge Drive	Gaithersburg	MD	20878	2009
Rite Aid #2204	Retail Store	Rite Aid Corporation	Rite Aid Corporation	2801 Foster Avenue	Baltimore	MD	21224	2012
Rite Aid Store #2212	Retail Store	Rite Aid Corporation		6402 Golden Ring Road	Baltimore	MD	21237	2013
			Marriott International,			1		
Rockville Courtyard	Hotel	Marriott International, Inc.	Inc	2500 Research Blvd	Rockville	MD	20850	2006
			Foulger-Pratt				1	
Rockville Metro Center	Office	Foulger-Pratt Management, Inc.	Management, Inc.	111 Rockyille Pike	Rockville	MD	20850	2009
Rockwall 1	Office	Rockwall 1 and 2 LLC	The JBG Companies	11400 Rockville Pike	Rockville	MĎ	20852	2010
	1		1			1		1
			Cushman and	الله الله الله الله الله الله الله الله	1	Ė	1	2014, 2013,
S-01798 - 6220 Old Dobbin Lane	Office	LSOP 3 MD 5, LLC	Wakefield of Maryland	6220 Old Dobbin Lane	Columbia	MD	21044	2012, 2011, 2010
							1	
	4		Cushman and			1	1	2014, 2013,
S-01976 - 6230 Old Dobbin Lane	Office	LSOP 3 MD 5, LLC	Wakefield of Maryland	6230 Old Dobbin Lane	Columbia	MD	21045	2012, 2011, 2010
24 P. 1 2 2 1 W. W. C. C. C. C. C. C. C. C. C. C. C. C. C.	Ì					1		
	*		Colliers International		***	ľ	Ì	2015, 2013,
S-02087 - 9755 Patuxent Woods Drive	Office	LSOP 3 MD 3, LLC		19755 Patuxent Woods Drive	Columbia	MD	21046	2012, 2011, 2010
SALISBURY ADMINISTRATION/MD/Site #CA15	Office	PNC Bank		110 W MAIN ST	SALISBURY	MD	21801	2014
SALISBURY, MD-2361 - Jcp	Retail Store	JCPenney	JCPenney	2308 N SALISBURY BLVD	SALISBURY	MO	21801	
Sam Hicks - FBI Building	Office	Rubicon GSA II Windsor Corporate Center 5, LLC	Kaufman Jacobs	12600 Lord-Baltimore Drive	Baltimore	IMO		2014, 2012
A CONTROL OF THE PROPERTY OF T	in the second	Stantout only a standardining contents on the administration of	Mackenzie	FOOD FOR CONTRICTION OF PARTY AND CONTRACTOR OF THE PROPERTY O	aridition franchistinisticalismis	-		· Properties
Schiling Lot 21	Office	Schilling Pepper Improvements Business Trust	Management	111 Schilling Road	Hunt Valley	MD	21030	2010, 2009
The state of the s		A Section of the sect	THE PERSON NAMED OF THE PE	A 1 1 Det united 1 second		1	1	10.012000
Sears Glen Burnie, MD	Retail Store	Sears Holdings Corporation	· ·	7900 RITCHIE HWY	Glen Burnie	MD	21061	2014, 2012, 2010
and the second second second second second second second second second second second second second second second	in the second second second second	and the same of th	Sears Holdings	A THE COURT OF THE PARTY OF THE		-		
		*	Management		ł	i.	-£	t
Sears Store 1374 - Bel Air, MD	Retail Store	Sears Holdings Management Corporation	Corporation	658 Baltimore Pike	BEL AIR	MD	21014	2012
Section of the sectio	and the second second	or many and the state of the st	Sears Holdings			**********	1	-
	1		Management			Į.	ri Li	Ì.
Sears Store 1634 - Baltimore MD.	Retail Store	Sears Holdings Management Corporation	Corporation	6901 Security Blvd	Baltimore	MD	21244	2012
	- Francisco	dereit er af er beneder i beneder i beneder i beneder i beneder i beneder i beneder i beneder i beneder i bene	Sears Holdings	and the second of the principal of the second of the secon	***************************************			*************
1	1	** <b>1</b>	Management	•	GAITHERSBUR		Į	<b>[</b> ,
Sears Store 1754 - Gaithersburg, MD	Retail Store	Sears Holding Management Corporation	Corporation	701 RUSSELL AVE	iG	MD	20877	2011
	1) ANDI OMIC	creation description in the control of the control	ingipisippopulari paga i	- Transport of the second of t	and the desired of the section of th	uig-ko-ssur		



(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOGRACY BLVD	BETHESDA	MO	20817	2013
	•	•	Sears Holdings					
Come Stars 1914 Columbia MD	Datail Chara	Committee to the committee of the commit	Management	AAAAAA LETTI E DATIMENT	00113404	1	04044	2004
Sears Store 1844 - Columbia, MD	Retail Store	Sears Holdings Management Corporation	Corporation	10300 LITTLE PATUXENT	COLUMBIA	MD	21044	\$50.1.1
	į		Sears Holdings		į.	l.	Ì	****
Const State 1954 Baltimore MD	Retail Store	Coors Unidian Management Comment	Management Corporation	8200 PERRY HALL	BALTIMORE	MD	21236	10044
Sears Store 1854 - Baltimore, MD	Licras om a	Sears Holding Management Corporation	Sears Holdings	10200 PERK! HALL	SPALIMORE	INIU	121230	\$2011
	<b>.</b>	1	Management	39. 4.	Ī	į.	<b>!</b> :	7
Sears Store 1864 - Cockeysville MD	Retail Store	Sears Holdings Management Corporation	Corporation	126 SHAWAN RD	Cockeysville	MD	21030	2012
Opens Cools 1007 - Cooks (STING NIC)	1 ACIDA CIOLO	Social Inniting Manifesting Control Stori	Sears Holdings	A CO OF ICIN ROLL THE CONTRACTOR OF THE CONTRACT	COCKEA 2418G	TAIL	121000	TO IT
	į.		Management	(13394).	ĺ	Ī		
Sears Store 2664-Frederick, MD	Retail Store	Sears Holdings Management Corporation	Corporation	5500 BUCKEYSTOWN PIKE	FREDERICK	MD	21703	2011
COST OF COST O	1/ORN COLE	2 OCOD 1 INTINGA MISHOREHICHE COING BROWN	Sears Holdings	2000 BOOK COLOMA HAT	minimized interpretation	Sealer Service	A PRINCIPAL	June 1
	<b>:</b>		Management	Level	<u>.</u>	İ	Date:	1
Sears Store 2774 - Cumberland, MD	Retail Store	Sears Holding Management Corporation	Corporation	1262 VOCKE RD	CUMBERLAND	Mn	21502	2011
A STATE OF THE PARTY OF THE PAR	TO THE STATE OF TH	an Shariya ya sanan ili tara kadi carata ili Adi Adi Andi Andi Andi Andi Andi Andi	Sears Holdings	- E 1 POSE Y DONNE 1 NO - Service de la Company de la Com		1.41	1-1705	<del>J. M. Marieriania</del>
		***	Management	**************************************			l.	4
Sears Store 2963 - Westminster, MD	Retail Store	Sears Holdings Management Corporation	Corporation	400 N CENTER ST	Westminster	MD	21157	2012
Seventh-Day Adventist World HQ	Office	Seventh Day Adventist	ga ceratrya office exist for treat division descriptions principalization	12501 Old Columbia Pike	Silver Spring	MD		2013
The state of the s	Control of the section of the sectio	and the second s	middirling dispersion with second contract on be calculated	A CONTRACTOR OF THE PROPERTY O		<del> </del>	A STATE OF THE PARTY OF THE PAR	- Bagginerinininingin
	<b>\$</b> :		10401 Fernwood LLC.	1	1	1.	1	4
			c/o LPC Commercial		1	Į.		4
Shady Grove Plaza	Office	SG Holdings LLC c/o Meritage Properties	Properties Inc.	15245 Shady Grove Road	Rockville	MD	20850	2013
eringe de la language		nt de transmission of him will the singles on the monutable consideration of the final care of the first and the constraint of the second state of the constraint of the second state of the constraint of the second state of the constraint of the second se	taritation from the section of the s	na dianti radiona di pranti indi dali di radiona di dali na didina tanda any manda any manda any manda tanda m Tanàna manda di dianta di dali di dali na di dali na didina di dali na didina di dali na di dali na di dali na	ari manimumini firanca manakataki na babat bi metai fa	1	dans language	1
Siemens Beltsville	Office	Siemens Beltsville		6435 Virgina Manor Road	Beltsville	MD	20705	2013, 2012, 2010
Control of the second s	in the state of th	ياً پايتون در در در در در در در در در در در در در	Marriott International,	તા જેવા મુખ્યત્વે ભાગમાં ભાગમાં વધા છે. જેવા અને જેવામાં તેવા ભાગમાં તેવા છે. જેવામાં તેવા કાર્યા માને તેવા ભાગમાં અન - જેવામાં તેવામાં ભાગમાં ભાગમાં ભાગમાં તેવા ભાગમાં તેવા ભાગમાં તેવા છે. જેવામાં તેવામાં તેવામાં ભાગમાં તેવા ભા	agitaretas dalamentaj ki intermedi de canaj es spesa ana	i.		egennandaraman in aman
Silver Spring North Courtyard	Hotel	Marriott International, Inc.	inc.	12521 Prosperity Dr	Silver Spring	MD	20904	2007
The second state of the second	والمتراور والمراور وا	angen in melangkan dan sejaja ni melangkan melangkan melangkan melangkan menandak mengenteran sejarah sejarah Sejarah melangkan dan sejaja ni melangkan melangkan melangkan pengan melangkan mendalak mengenteran sejarah se	Marriott International,	कारके प्रकार कारक संप्रकारक का कि कि 19 स्वापित कारक रहा है। - हैं- -	deriman (ekster stadio) filosopia mer en americ (he terra e Alfreita par E	1	- Prince	· daglad syttemer and an address in restrong
Silver Spring Residence Inn	Hotel	Marriott International, Inc.	inc.	12000 Plum Orchard Dr.	Silver Spring	MD	20904	2007
And the second s	A SEAN SECTION OF SEASON OF PROPERTY SEASON SECTION SE	ing the last three to the second spines and reserving appropriately a second spines of the file back the second se	Somersel County	A contract to the second secon	And comes character of a close to a ferringer of the systemation	1		A STATE OF THE PROPERTY OF THE PARTY OF THE
Samerset Intermediate School	K-12 School	Somerset County Public Schools	Public Schools	7970 Tawes Campus Drive	Westover	MD	21871	2011, 2010
		and the state of t	***************************************		Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Santa Sa		1	Andreas de la constante
	Į:	· 1.			SILVER	Ī		2014, 2013,
SSMP-101	Office	Brookfield Properties		8401 COLSVILLE RD.	SPRING	MD.	20910	2012, 2011, 2010
	1			1				2015, 2013,
	<b>]</b> ,	Company of the Compan			*	Į.		2012, 2011,
SSMP-201	Office	Brookfield Properties		(8403 Colsville rd.	Silver Spring	MD	20910	2010, 2009
And the second of the second o	· · ·	S S			SILVER	1	į.	-1
SSMP-301	Office	Brookfield Properties		8405 COLEVILLE RD.	SPRING	MD	20910	2014, 2013
Andrew Same Same Carlot and Carlo		* * * * * * * * * * * * * * * * * * *	St. John Properties,			1	į.	1
St. John Properties, Inc. Headquarters	Office.	Windsor Corporate Center 5C, LLC	Inc.	2560 Lord Baltimore Dr	Baltimore	MD	21244	2012, 2011
	Warehouse and	The state of the s	No. of Asia and Asia and Asia and Asia and Asia and Asia and Asia and Asia and Asia and Asia and Asia and Asia	A state of the second second state of the second se		1		1
Staples Distribution Center 6227, Savage, MD		Staples Inc.	Staples Inc.	6930 San Thomas Rd	Savage	MD	121075	2010
	Warehouse and		AND AND AND AND AND AND AND AND AND AND	A		1	Kanana and	1
Staples RDO 10344 in Salisbury, MD	Storage	Burton Energy Group	Staples Inc.	119 W Naylor Mill Road #9	Sallsbury	MD		
Staples Store 1103 California, MD	Retail Store	Staples Inc.	Staples Inc.	45035 Worth Ave	California	MD	120619	2012, 2011
				8168 Elliott Road		1		1
Staples Store 1169 Easton, MD	Retail Store	Staples Inc.	Staples Inc.	Suite 1	Easton	MD	21601	2012
Staples Store 1243- Glenmont, MD	Retail Store	Staples Inc.	Staples Inc.	12389 Georgia Ave	Glenmont	MD	20902	2010

(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA	MD	20817	2013
Staples Store 1279 Hanover, MD	Retail Store	Staples Inc.	Staples Inc.	7661 Arundel Mills Blvd	Hanover	MD	21076	2013
Haples Store 148 Towson, MD	Retail Store	Staples Inc.	Staples Inc.	803 Goucher Blvd	Towson	MD	21286	
Staples Store 26- Rockville, MD.	Retail Store	Staples inc.	Staples Inc.	11503 B Rockville Pike	Rockville	MD	20852	2012, 2011, 2010
Saples Store 460 Lavale, MD	Retail Store	Staples Inc.	Staples Inc.	[1236 National Highway	Lavale	MD		2011
Staples Store 689 Annapolis, MD	Retail Store	Staples Inc.	Steples Inc.	[2631 Housley Road	Annapolis	MD	21401	2012
Staples Store 857 Fredrick, MD	Relail Store	Staples Inc.	Staples Inc.	5557 Urbana Pike	Fredrick	MD		2012
TOTAL TOTAL	Warehouse and	Comments of the state of the st	Sanitation of the configuration of the State	Some of the state	1.100100	districtions FIAITA		15015 15015
itaples Warehouse 4994- Hagerstown, MD	Storage	Staples Inc.	Staples Inc.	11540 Hopewell Rd	Hagerstown	MD	21740	2011, 2010
The state of the s	initial income and a second	Annaplatinahan paparan mengangan mengangan mengangan menganpangan Tampan 110.	Queen Anne's County	4 TOLO I INDOMEST OF	II idde:30mi	1410	21170	12011,2010
itevensville Middle School	K-12 School	Queen Anne's County Public Schools	Public Schools	1610 Main Street	Stevensville	MD	21666	2009
Sudjersville Elementary School	K-12 School	Queen Anne's County Public Schools	Energy Education Inc	300 South Church Street	Sudiersville	MD		2008
Sudersville Middle School	K-12 School	Queen Anne's County Public Schools		201 North Church Street	Sudiersville	MD		2008
THE RESIDENCE OF THE PARTY OF T	Supermarkel/Grocery	And an anti-man destinate with tenth for the last of the second and the contract of the second and the second a	County of the second se	Englishing a landstate and market market for a real selection or recommendation of the	1 de la constanta de la consta	-	12.000	And a second section in column
SVU 052026	Store	SUPERVALU, Inc	SUPERVALU, Inc	SHOPPERS FOOD WAREHOUSE- CORAL.	CORAL HILLS	MD	20743	2004
The second section of the second second second second second second second second second second second second	Supermarket/Grocery	Control of the same of the sam	in the second se	POLICE POLICE CONTRACTOR CONTRACT		1	20,70	
SVU 054025	Store	SUPERVALU, Inc	SUPERVALU, Inc	METRO FOOD MARKET-JUMPERS	PASADENA	MD.	21122	2004
To the state of th	Supermarkel/Grocery	to the state of the second of	And Titelio III	and the restriction of the state of the stat		†**·	· · · · · · · · · · · · · · · · · · ·	1
SVU 054029	Store	SUPERVALU, Inc	SUPERVALU, Inc.	METRO FOOD MARKET- SMITH AVENU	BALTIMORE	MD	21209	onne
A Comment of the second	Supermarket/Grocery	Annual martin and the state of	and statement and the statement of the s	Salar 11.00 ( OOD 1884 1477) . Out 11.1 1 1.4 1.7	- Chickenin	***************************************	121200	******
SVU.054040	Store	SUPERVALU, Inc	SUPERVALU, Inc	METRO FOOD MARKET- ROUTE 40	BALTIMORE	MD	21229	2004
And the second s	Supermarket/Grocery	ACO THE CALIFORNIA CONTROL TO THE CONTROL OF THE STATE OF THE CONTROL OF THE CONT	Distriction and State of the Authorities	The transfer of the second of	BROOKLYN	1		
SVU 054064	Store	SUPERVALU, Inc	SUPERVALU, Inc	METRO FOOD MARKET- BROOKLYN PA	PARK	MD	21225	2004
the same to the same of the sa	Supermarket/Grocery	ي من كونيدة والمرافق المرافق المستحدة والمرافق المرافق المرافق المرافق المرافق المرافق المرافق المرافق المرافق - المرافق المرافق المرافق المستحدة والمرافق المرافق	er er er er er er er er er er er er er e	Transport manifestive property of the principle of the state of the st	,	·	-	
SVU 054065	Store	SUPERVALU. Inc	SUPERVALU, Inc	METRO FOOD MARKET- BROAD STREE	TIMONIUM	MD.	21093	2004
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Target T1007	Retail Store	Target Corporation		3343 CORRIDOR MARKETPLACE	LAUREL	MD	20724	12014
Target T1008	Retail Store	Target Corporation	Target Corporation	3300 WESTERN PKWY	WALDORF	MD	20603	2010
Target T1043	Retail Store	Target Corporation	Target Corporation	11025 MIDDLETON RD	ABERDEEN	MD	21001	2010
Target T1044	Retail Store	Target Corporation	Target Corporation	6111 DOBBIN RD	COLUMBIA	MD	21045	[2011
Target T1045	Retail Store	Target Corporation	Target Corporation	11200 REISTERSTOWN RD	OWINGS MILLS	MD	21117	2010
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(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESDA GAITHERSBUR	MD	20817	2013
Target T1193	Retail Store	Target Corporation	in a state Township has been been been been been been been bee	25 GRAND CORNER AVE		MD	20878	2015
Target T1257	Retail Store	Target Corporation	Target Corporation	17213 COLE RD	HAGERSTOWN			2010
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Target T1265	Retail Store	Target Corporation	Target Corporation	9901 YORK RD	COCKEYSVILL	MO		2010
Target T1295	Retail Store	Target Corporation	Target Corporation	6100 GREENBELT RD	GREENBELT	MO	20770	2010
Target 71415	Retail Store	Target Corporation	en a a de la partir de la companya de la partir de la companya de la companya de la companya de la companya de	11160 VEIRS MILL RD	WHEATON	MO		2015
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Target T2310	Relail Store	Target Corporation	Target Corporation	28539 MARLBORO AVE	EASTON	MD	21601	2012
Target T2393	Retail Store	Target Corporation	Target Corporation	3201 TIOGA PKWY		MD		2013
Target 72394	Retail Store	Target Corporation	Target Corporation	15922 CRAIN HWY SE	BRANDYWINE	MD		2013
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The Atrium at Rock Spring Park	Office	10401 Ferriwood LLC, c/o Meritage Properties	Lincoln Property Company	10401 Fernwood Road	Bethesda	МО	20817	2014, 2012, 2010, 2005, 2004, 2003
The Chevy Chase Metro Building, Two Wisconsin Circle	Office	Two Wisconsin Circle Joint Venture	The Chevy Chase Lar Company of Montgomery County, Maryland	Two Wisconsin Circle	Chevy Chase	MD	20815	2012
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(71033A) MONTGOMERY MALL	Retail Store	May Company Montgomery Condominium, LLC	Macy's Inc	7125 DEMOCRACY BLVD	BETHESOA	MD	20817	2013
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USDOE Headquarters: Germantown	jOffice	U.S. Department of Energy	Energy	19901 Germantown Road	Germantown	MD		2002
Veritiv - Hanover MD	Distribution Center	ixpedx, LLC		7445 New Ridge Rd	Hanover	MD	21076	
Verizon Wireless - Frederick - 82194	Retail Store	Verizon Wireless		1003 WEST PATRICK ST	FREDERICK	₽MD	21702	2015, 2013
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Verizon Wireless - Gaithersburg - 10362	Retall Store	Verizon Wireless	1	472 N FREDERICK AVE	lG .	MD		2014, 2011
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Washington High School	K-12 School	Somerset County Public Schools	Public Schools	10902 Old Princess Anne Road	Princess Anne	MD	21853	2011, 2010
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Wayne Plaza	Office	Washington Real Estate Investment Trust	Estate Investment Trus	1962 Wayne Ave	Silver Spring	MD	120910	2012, 2009
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Weis Markets #180	Store	Weis Markels	Weis Markets	19400 Scott Moore Way	Perry Hall	MD	21128	2011
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Wells Fargo Tower	Office	Harbor Group Management Company	Bir albungan dan merupanyan penyadah samulas da di deba	7 Saint Paul Street	Baltimore	MD	21202	2010, 2009, 200
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Westside Intermediate School	K-12 School	Wicomico County Board of Education	Board of Education	I8000 Quantico Rd.	Hebron	MD	21830	2012, 2011
			Wicomico County	1	1_	1	1	l
Westside Primary School	K-12 School	Wicomico County Board of Education	Board of Education	16046 Quantico Rd.	Quantico	MD	21856	
WHEATON, MD-2738	Retail Store	JCPenney	and the second s	11160 VEIRS MILL RD	WHEATON	MD	20902	
Windsor Station	Office	Preston Sheffenacker Properties	Cushman Wakefield	2810 Lord Battimore Dr	Windsor Mill	MD.	21244	12015
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Wisconsin Place	Office	Boston Properties Washington Regional Office		5404 Wisconsin Ave	Chevy Chase	MD	20815	2011, 2010

## ATTACHMENT B

## Why Benchmark?

Utilities are the largest non-fixed expenditure of a business. Benchmarking provides a basic but valuable way for building owners and managers to understand energy use and identify cost-effective opportunities to reduce energy costs.

Benchmarking provides a standard metric to allow comparison against past performance and peers. These comparisons have been shown to drive energy efficiency upgrades, increasing occupancy rates and property values.

## The New Law

The Building Energy Benchmarking bill requires the owners of certain non-residential buildings to benchmark the energy use of certain buildings and report to the County for disclosure.

Montgomery County has a goal to reduce greenhouse gas emissions by 80% by the year 2050. Commercial buildings make up one-third of county emissions.

## Resources

View the bill and learn about events and resources:

montgomerycountyma goviDEP/ Energy/Bonchmarking.html

Learn about and create an account:

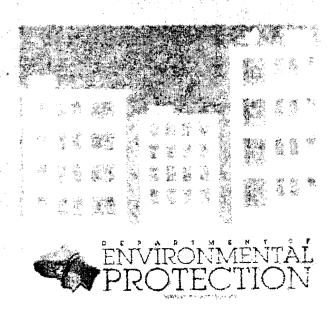
Sign up for webinars:
energystar gov/buildings@raining

bit.ly/MoCoEnergyNews

Michelle Vigen
Senior Energy Planner
Michelle Vigen@
montgomerycountymd.gov
240-777-7749

## Building Energy Benchmarking Law

What you need to know about the law and how to get started.





## Who Needs to Benchmark?

Buildings covered under the Law include County and private non-residential buildings (and groups of buildings on a common parcel) with 50,000 gross square footage or more. These private buildings are divided into Groups 1 & 2 as shown in the table below.

County	≥ 50,000 sq. ft.	2014	06/01/2015
Group 1	≥ 250,000 sq. ft.	2015	12/01/2016
Group 2	≥ 50,000 sq. ft.	2016	12/01/2017

Specific use types are exempt from the Law, including warehousing, self storage, manufacturing, industrial, transportation, communication, and utilities. Cases of low occupancy, economic hardship, or new and demolished buildings may qualify for a waiver.

Over one thousand of the nearly 4,300 commercial buildings in Montgomery County have accounts in Portfolio Manager. Of these buildings, 122 have achieved a score of 75 and are certified as ENERGY STAR buildings.



## How do I Comply?

buildings to benchmark by checking your gross square footage and reviewing the law.

information about your buildings, space type, and energy use. Request energy data from your utility (if 5+ tenants) or from your tenants.

your building's energy use in ENERGY STAR Portfolio Manager.

your data to ensure its accuracy.

to the County by your first deadline.

Further details will be published as program guidelines in 2015.

If the building scores above 75, complete the certification process to earn the ENERGY STAR label.

Improve your score by lowering energy consumption through conservation or energy efficiency.

Take advantage of energy efficiency incentives provided by your utility.

# ATTACHMENT C

## Early Bird Benchmarking

The Montgomery County Department of Environmental Protection (DEP) would like to extend a big thank you to our Early Bird Benchmarkers!

These organizations earned the esteemed title of *Early Bird Benchmarker* by voluntarily reporting calendar year 2014 building profile and energy use data to DEP by August 1, 2015. These organizations have greatly assisted DEP with developing data analyses and new guidance and outreach materials, and are well-positioned to meet the upcoming requirements of the County's Benchmarking Law.







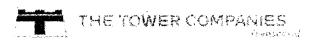






THE JBG COMPANIES



















We also acknowledge the leadership our own Montgomery County Department of General Services (DGS) has demonstrated by meeting their initial June 1, 2015 deadline. County buildings were given a deadline ahead of private sector deadlines so we might lead-by-example. DGS has contributed invaluable input, feedback, lessons learned, and best practices to enhance our benchmarking support for the rest of the County.

## ATTACHMENT D

https://www.energystar.gov/buildings/facility-owners-and-managers/existing-buildings/use-portfolio-manager/verify-your-information-data

## Verify your information with the data quality checker

Once you've entered your data, Portfolio Manager has a handy tool to help you check for errors and anomalies.

From the Summary Tab of each property, you can run a simple verification that compares your data with typical values. This will help you identify energy values and property use details that are unusual given your building's use. It'll also help you identify possible typos, incorrect meter readings, missing information, incorrect units of measure, and other common data entry problems.

If a value is flagged that's actually accurate, you can enter an explanation ... which is useful if you're sharing your data with others or applying for ENERGY STAR certification.

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Industrial energy management </buildings/facility-owners-and-managers/industrial-plants>
Tools and Resources </buildings/tools-and-resources>

Small business </buildings/facility-owners-and-managers/small-biz> Training </buildings/training>

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If a value is flagged that's actually accurate, you can enter an explanation ... which is useful if you're sharing your data with others or applying for ENERGY STAR certification.

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## DEP Comments on AOBA's Testimony on Verification

DEP appreciates AOBA's input during the collaborative Working Group process with the County's stakeholders and during this amendment review. We offer this response to the issues and proposals raised in their testimony regarding the verification component of the law.

## **Rationale for Verification**

Verification has been a central part of Montgomery County's benchmarking and transparency law from its introduction. Its inclusion is based upon the best practice of other benchmarking and transparency laws in the country. Verification is considered the new standard for jurisdictions exploring similar legislation, and jurisdictions with implemented laws, such as Seattle, are also exploring adding verification to improve data quality.

Data Quality Is an Inherent Issue: Data quality and compliance have been a challenge among the jurisdictions with benchmarking and transparency laws. While response rates have been favorable (75% - 90% in the first year), data completeness and quality has been an issue throughout. Benchmarking and reporting to a public entity is a data-centric activity, open to human error, even in jurisdictions that have enjoyed a smooth roll out with robust outreach and education. Results from other jurisdictions with benchmarking laws are illustrative of the importance of verification:

- In Minneapolis, MN (No verification): Year 1 data resulted in over 25% of submissions having obvious data errors. Enormous staff effort over the last year has reduced this number to about 15%.
- In Washington, DC (No verification): Similarly, found 25% of submissions to have incomplete data; it is worth noting that most of these submissions were by owners/managers who honestly thought they had complied fully with the law. Of complete submissions by office buildings, approximately 9% were found to have critical data quality issues.
- In Chicago, IL (Verification the first year and every three thereafter): Year 1 data resulted in less than 3% with critical errors and only an additional 2.5% with outlier data, indicating potential data errors.

Further, in our County Early Bird Benchmarking program, DEP received over 60 buildings as part of a voluntary process. Our Early Bird participants were not required to do verification and knew that the data would not be included in any official dataset related to benchmarking. Early Bird participants were overwhelmingly the most motivated, interested, and in many cases, experienced benchmarkers in the County. Not to discount the effort of our Early Bird and County benchmarkers, DEP examined and identified several data quality issues throughout our Early Bird dataset. Of these buildings, there was only one submission without issues — that being the one that completed verification (voluntarily).

The verification requirement is not a statement questioning the building owners' reliability and integrity, but an acknowledgement that a data-centric activity has ample opportunity for honest human error. A business uses an accountant to check their books and taxes before submitting to the IRS – this is to ensure that everything is accurate, representative, and compliant. Verification is an opportunity for the building owner to catch similar errors, from the data gathered from various sources needed to complete the benchmarking process (such as billing errors on the part of the utility or energy provider) to the actual entry of data into Portfolio Manager.

**Importance of Data Quality:** The Benchmarking Law and its benefits are only as strong as the data is accurate. If the data is not correct, it is not usable by building owners and managers for making energy improvement decisions, or comparing buildings across a portfolio.

Further, a market transformation cannot occur if building owners and tenants cannot trust that the data of their peers is equally as verified and reliable as their own. Verification sets a known and equally applied standard of accountability. In particular, due to the resources and information AOBA offers their membership as a partner in our outreach efforts, we expect their membership to have better quality submissions. We believe it is in the best interest of AOBA's membership that all properties are held to the same standard regarding the quality of their benchmarking data so that comparisons across the entire building marketplace are reliable.

## AOBA's Recommendations regarding Verification

DEP has enjoyed their collaboration and partnership with AOBA and counts many of their members as allies in our energy work. We must, however, respectfully disagree with their proposed amendments:

Delayed implementation: Verification the first year allows the building owner to have the value of a knowledgeable resource and second pair of eyes as they establish their processes and procedures that will then carry them through each compliance year. The first year is the best opportunity to get the building profile in correctly, as often these numbers will not change dramatically over the years (e.g., attributes such as use, square footage, and occupancy). The first year is also when data access processes are also set up with the utility company, and verification can help ensure that this connection is set up properly. When both the building profile and energy data are set up correctly the first year, these processes will be used for following years with confidence they are providing accurate data. To delay implementation could mean that building owners spend time the first year doing the initial upfront work, and verification in the second year will require possibly just as much work correcting potential errors from Year 1.

**Recordkeeping:** Unfortunately, the availability of records on-file does not constitute a data verification program. To consider recordkeeping a verification program, DEP would need to collect even more information than is already set to be reported (DEP would need to seek the monthly annual energy data from each building owner, not just the annual data) and devote enormous staff resources to individually check individual Portfolio Manager accounts for proper inputs. Further, only one of DEP's energy staff would have the credentials to complete such a verification. To ensure data quality, DEP would then have to provide feedback and technical assistance to each building owner in addition to handling any compliance issues found through such a review, potentially very far past the submission and deadline.

In the Early Bird process, DEP reviewed the submitted data in great detail to identify potential data quality issues. This effort, serving only a handful of our community's building owners, took a significant amount of time, and would be unrealistic to expand to the full universe of buildings in the County.

The currently proposed verification process allows the building owner to select who reviews their monthly data and building profile details, and allows feedback to happen prior to the data submission deadline. As such, a building owner can be confident of compliance at the point of submission, versus waiting for DEP to request, review, and provide feedback on their submission.

**Approved Credentials:** DEP does not support AOBA's proposal to add to the list of Recognized Data Verifiers "persons with 10 years or more managing energy for a building owner or manager." It would be difficult for DEP to review individual cases and make a fair judgment on what counts as energy management experience. This proposed expansion would also require DEP to make an evaluation of a recognized data verifier on years served "managing energy" (*regardless of building performance*) rather than proven understanding of building energy management as demonstrated by a recognized 3<sup>rd</sup> party certification program. It is our opinion that relying on 3<sup>rd</sup> party credentials is the fairer and more effective policy.

We recognize there are individuals in the building and energy industries that may not have these credentials but are clearly very knowledgeable about energy systems and benchmarking. Chicago has noted that the cost of verification was largely dependent on the quality of the initial data collection and input. A building owner or manager with energy management or benchmarking experience, could expect verification of their data to be easy and therefore relatively inexpensive.

In Chicago, IL, verification was completed for 90% of first year submissions, yet only six (6) different credentials were recognized. In the proposed amendments, the list of Recognized Data Verifiers has been extended and includes an exhaustive list of 20 applicable credentials, including those commonplace in property management circles.

This list was built by the Work Group, including AOBA, with criteria that ensure the verifier has 1) experience and knowledge with Portfolio Manager, and 2) sufficient experience and knowledge with building energy systems to provide a cost-effective review of the building characteristic and energy data. At the request of AOBA and their membership, this list has been expanded to include property management credentials with an emphasis on energy management. Several credentials are either low-cost to recruit and contract, or even to obtain in-house.<sup>1</sup>

The Work Group also agreed on an alternative verification path for building owners that had achieved ENERGY STAR® Certification for at least 6 months of the year being benchmarked. Since ENERGY STAR® Certification requires verification, this would eliminate duplication between County and ENERGY STAR® requirements. This, along with the 20 credentials for verification, allow for a number of paths to complete verification while allowing the County to disclose high-quality, reliable building energy data.

Finally, DEP is committed to exploring, for the Group 2 buildings (medium-sized) a pro bono verification program for organizations that may struggle to meet the cost of this requirement. The cost of verification, depending on the initial data quality, is anticipated to range anywhere between \$300 per building for a very complete and accurate profile to \$800 or more per building for a profile that will require substantial benchmarking work on the part of the contractor (some companies are also discussing no-cost services with certain sales packages or service subscriptions).



<sup>&</sup>lt;sup>1</sup> Note: DEP had begun developing a set of courses with Montgomery College Workforce Development and Continuing Education that would qualify a person to do verification. Based on a limited survey of AOBA's membership to gauge demand, it was indicated that many larger building owners either (a) have the verification expertise in-house or (b) would not have found this certification program necessary to meet the requirement.