



The New York City Department of Citywide Administrative Services' Compliance with Energy Efficiency Laws

What questions did the audit look at?

- ▶ Is the New York City Department of Citywide Administrative Services (DCAS) accurately reporting energy usage data?

Why does it matter for New Yorkers?

As New York City begins to grapple with the consequences of prolonged climate change, the City government has struggled to limit its energy usage and improve efficiency.

In response to a Comptroller's audit that found serious problems with the City's measuring of energy usage, the City Council enacted Local Law 45 in 2018. The law requires DCAS—the agency that manages most City properties—to track and report annual energy usage in City-owned or leased buildings, as well as the progress of efficiency improvements.

Our most recent audit of DCAS' published reports found that DCAS generally complied with reporting requirements; however, we found multiple data errors, data collection and integrity weaknesses, and inadequate tracking of efficiency improvement projects. As a result, we determined that all four annual reports published by DCAS were unreliable. In one case, DCAS underreported fossil fuel usage in City buildings by as much as 29%.

It is imperative that DCAS provide accurate and complete data. DCAS' annual reports are crucial components of the City's efforts to assess its own energy usage and carbon footprint; if the underlying data cannot be trusted, a comprehensive profile of the City's true energy usage remains out of reach.

While DCAS has acknowledged the mistakes in its four published reports, it should drastically overhaul its reporting practices to ensure that they are not repeated. New York City's ability to meet its ambitious efficiency benchmarks may very well depend on it.

What changes did the agency commit to make following the audit?

- ▶ DCAS agreed to correct errors made in its annual energy efficiency reports, clearly identify revisions, and notify all stakeholders.

AUDIT FINDINGS



DCAS published annual energy efficiency reports with distorted usage data.



DCAS miscategorized City facilities, thus skewing reporting.



DCAS' data on installation of real-time meters was inconsistent and incomplete.



DCAS' reporting on building envelope assessments and improvements was inconsistent and incomplete.



Some fossil fuel and steam usage data was two years out of date.



Some facility data that should have stayed consistent varied from year to year.



Audit Recommendations	Agency Response
<p>1 Maintain accurate records of electricity usage, RTM installation status, fossil fuel and steam usage, and building envelope assessment and improvement status.</p>	<p>DISAGREED</p>
<p>2 Evaluate and revise its data collection, analysis, and review policies and procedures to prevent the data discrepancies and errors identified by the audit.</p>	<p>PARTIALLY AGREED</p>
<p>3 Improve its report preparation and review processes to ensure that all published information is complete and free of errors and inconsistencies.</p>	<p>PARTIALLY AGREED</p>
<p>4 Coordinate with all stakeholders and explore options for timely collection and verification of heating fuel oil usage information.</p>	<p>DISAGREED</p>
<p>5 Identify sources for complete reporting on building envelope assessment and envelope improvement status.</p>	<p>DISAGREED</p>
<p>6 Ensure data integrity of facility-level data, including ownership status and agency affiliation.</p>	<p>PARTIALLY AGREED</p>
<p>7 Evaluate the impact of inaccuracies in reported ownership status on other systems and critical tasks.</p>	<p>DISAGREED</p>
<p>8 Post the revised and corrected LL45 annual reports so that they can be easily found on the agency website, with clear indication of the corrections, and notify all stakeholders, as appropriate.</p>	<p>AGREED</p>



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