

# VERIFICATION REPORT FOR UNIVERSITY OF WISCONSIN MILWAUKEE CAMPUS WIDE CLEAN ENERGY & ENERGY EFFICIENCY PROJECT



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| <b>Project Title</b> | University of Wisconsin Milwaukee Campus Wide Clean Energy & Energy Efficiency Project |
| <b>Version</b>       | 2.1                                                                                    |
| <b>Report ID</b>     | 2018_RCE_VCS_5                                                                         |

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| <b>Report Title</b>  | Verification Report for University of Wisconsin Milwaukee Campus Wide Clean Energy & Energy Efficiency Project                                    |
| <b>Client</b>        | Second Nature                                                                                                                                     |
| <b>Pages</b>         | 13                                                                                                                                                |
| <b>Date of Issue</b> | 27-April-2018                                                                                                                                     |
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| Approved By         | Michael Coté |
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**Summary:**

The University of Wisconsin-Milwaukee Campus-Wide Clean Energy & Energy Efficiency Project (Project) quantifies emission reductions campus-wide in scope 1 stationary combustion emissions. The emission reductions are driven by the University of Wisconsin-Milwaukee's (UWM) program Energy Matters - Comprehensive Energy Efficiency and Awareness at the University of Wisconsin-Milwaukee, and the Project includes multiple energy efficiency and clean energy measures such as behavior change campaign/communications, lighting retrofits, on-site renewables, building system retro-commissioning and upgrades, weatherization improvements, LEED certification/green buildings, and innovative strategies. The project activities result in the reduction of greenhouse gases (GHG) including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) with CO<sub>2</sub> making up most of the emissions.

Second Nature contracted with Ruby Canyon Engineering, Inc. (RCE) to perform the verification of emission reductions during this monitoring period from 1 July 2016 to 30 June 2017. Second Nature manages the reporting platform for the Presidents' Climate Leadership Commitments (previously known as the American College & University Presidents' Climate Commitment or ACUPCC), assists schools in compiling data and calculating emission reductions, and provides support during the verification process, as necessary. UWM provided all data and supporting documentation to RCE.

The purpose of the verification is to ensure that the Project Proponent implemented the project activity according to the monitoring plan, that the emission reduction assertion submitted by Second Nature and UWM is materially correct and free of errors and omissions, and that the Project meets all criteria requirements. Specifically, RCE assessed the Project against the Approved VCS Methodology VM0025 Campus Clean Energy and Energy Efficiency version 1.0 and the Campus Clean Energy and Energy Efficiency Module VMD0038 version 1.0. RCE assessed the Project Monitoring Report, including the Project's monitoring plan, based on the above criteria documents as well as relevant VCS criteria and guidance documents.

During the verification process, RCE completed a desk review of the monitoring report and supporting documents to confirm that Project Proponents implemented the project activity as stated in the validated VCS Project Description. This included a review of data and information control systems and interviews with key personnel. During the verification, RCE issued Corrective Action Requests (2), Additional Documentation Requests (3), and Clarification Requests (2) which are described in Appendix A. Second Nature and UWM provided adequate responses to all requests.

RCE concludes, to a reasonable level of assurance, that the Project's GHG assertion of 4,125 metric tonnes of CO<sub>2</sub> equivalent emissions for the period of 1 July 2016 to 30 June 2017 is fairly stated.

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## 1 INTRODUCTION

### 1.1 Objective

The objective of the verification is to ensure that the GHG emission assertion made by Second Nature and UWM is materially correct and that the data provided are accurate, complete, and transparent. Additionally, RCE ensured that the Project is in conformance with the criteria as stated in Section 1.2

### 1.2 Scope and Criteria

The scope of the Project includes the boundary of the Project which includes all the main campus of UWM and all facilities as reported in UWM's GHG emissions inventory. The GHGs included in the scope of the Project are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O.

RCE conducted the verification based upon the following criteria:

- Verified Carbon Standard Version 3.7 (21 June 2017);
- VCS Program Guide Version 3.7 (21 June 2017);
- Validation and Verification Manual Version 3.2 (October 19, 2016);
- Approved VCS Methodology VM0025 Campus Clean Energy and Energy Efficiency version 1.0 (12 February 2014)
- Approved VCS Methodology Module VMD0038 Campus Clean Energy and Energy Efficiency: Campus-Wide Module version 1.0 (12 February 2014)
- Validated VCS Project Description, dated 24 July 2017;
- ISO 14064-3 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions".

Additionally, RCE reviewed the Project's monitoring period-specific Monitoring Report Version 2.1 dated 18 April 2018, including the monitoring plan, during verification activities.

### 1.3 Level of Assurance

RCE conducted the verification to a reasonable level of assurance.

The VCS Standard defines materiality as errors, omissions, or discrepancies resulting in misstatement of greater than five percent of the Project's GHG assertion. Additionally, RCE considered qualitative non-conformances with criteria requirements as material during the verification process

### 1.4 Summary Description of the Project

The Project is a campus-wide effort that includes multiple energy efficiency and clean energy measures to reduce scope 1 stationary combustion emissions. It has been carried-out using a VCS methodology, which provides procedures to quantify reductions achieved by colleges and universities in the United States. The Project specifically applies the campus-wide module under which campuses must meet the

relevant additionality performance benchmark. Emission reductions are quantified based on data from third-party GHG reporting programs—such as the Presidents’ Climate Leadership Commitments (previously known as the American College and University Presidents Climate Commitment (ACUPCC)) or the Sustainability Tracking, Assessment & Rating System (STARS)—for each year relative to a baseline period. The emission reductions are driven by project activities such as behavior change campaign/communications, lighting retrofits, on-site renewables, building system retro-commissioning and upgrades, weatherization improvements, LEED certification/green buildings, and innovative strategies. The project activities result in the reduction of GHGs including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) with CO<sub>2</sub> making up most of the emissions.

## 2 VERIFICATION PROCESS

### 2.1 Method and Criteria

The verification process involved the following independent and objective activities:

- Select a Verification Team;
- Perform a Conflict of Interest Review;
- Conduct a kickoff meeting with Second Nature and UWM;
- Review the validated Project Description;
- Review the Validation Report;
- Review the current Monitoring Report Version 2.1 dated 18 April 2018;
- Develop a verification plan and risk-based sampling plan;
- Review the Project information control systems and quality control procedures;
- Review the Project’s emission reduction calculations;
- Issue corrective action requests, additional documentation requests, and clarification requests, as necessary;
- Issue a verification report and verification representation; and
- Conduct an exit meeting with Second Nature and UWM.

RCE selected the verification team according to its GHG Verification Policies & Procedures to ensure team members are qualified to perform verification activities pertaining to the Project. The verification team consisted of the following individuals:

Lead Verifier: Nina Pinette  
Internal Reviewer: Michael Coté

Prior to verification activities, RCE performed a Conflict of Interest Assessment to determine whether any potential conflicts exist with the project developer. No issues were discovered that would affect the impartiality or independence of the verification team.

RCE held a kickoff call with Second Nature and UWM on 24 January 2018. The purpose of the kickoff call was to introduce the Second Nature and UWM personnel and the RCE verification team, review verification objectives and process, review VCS requirements, and to confirm the verification schedule.

RCE developed a verification plan and sampling plan that were used throughout the verification of this monitoring period. RCE created the plans after reviewing the Project Monitoring Report, validated Project Description, the VCS Standard (Version 3.7), and the methodology and methodology module.

RCE performed a risk assessment based upon the criteria listed above and evidence provided to RCE by Second Nature and UWM for the current monitoring period.

RCE used the verification plan throughout the verification as a basis for assessing the completeness, consistency, accuracy, and transparency of the Project's GHG emission reductions. RCE conducted a conference call with Second Nature and UWM in place of a site visit to the UWM campus on 7 March 2018 as described in Section 2.4.

## 2.2 Document Review

RCE performed a risk-based analysis of the Project and its emission reduction calculations to verify that the Project is in conformance with all criteria requirements and that the stated emission reductions are materially correct. RCE reviewed the following documents:

- Validated Project Description,
- Validation report,
- Monitoring Report Version 2.1 (dated 18 April 2018),
- Chevrolet-developed Microsoft Excel emission reduction calculator;
- Campus natural gas master spreadsheet
- Energy utility data master spreadsheet
- Purchased steam use summary spreadsheet
- Utility summary, We Energies main campus electricity
- Monthly natural gas invoices
- Outputs of emissions data from UNH's SIMAP tool used to calculate GHG emissions

## 2.3 Interviews

RCE held discussions with the following personnel during the verification:

- Kate Nelson, Chief Sustainability Officer, UWM: Kate oversees the development of UWM's GHG inventory and emission reduction calculations.
- John Gardner, Office of Sustainability Program and Policy Analyst, UWM: John works with utility accounting representatives and facility contacts to aggregate data for UWM's GHG inventory and emission reduction calculations.
- Ruby Woodside, Innovative Services Manager, Second Nature: Ruby works for the organization managing the ACUPCC reporting platform and provides technical assistance to UWM during the emissions reporting and offset project development and reporting processes.

## 2.4 Site Inspections

RCE determined that a full physical inspection of the campus was not required to achieve a reasonable level of assurance that the emission reductions reported for this monitoring period were materially correct; a call would provide sufficient information for the verification. As a result, RCE conducted a Project assessment via conference call. The call was attended by key UWM personnel, Kate Nelson

and John Gardner, as well as Ruby Woodside from Second Nature. The project personnel provided an overview of the Project including project data, supporting documentation, emission reduction calculations, and the GHG inventory. Interviews also included detailed reviews of inputs to the Chevrolet-developed Microsoft Excel calculator as well as the functionality of the calculator. UWM described in detail its emissions inventory development and the source data used in the process. RCE also confirmed that there had been no changes to project activities since validation, and that UWM demonstrated emission reductions against the baseline period during the monitoring period.

## **2.5 Resolution of Findings**

During the verification process, RCE issued one material corrective action request (CAR), one non-material CAR, three additional documentation requests (ADRs), and two clarification requests (CRs). RCE documented these requests in the List of Findings. Second Nature and UWM sufficiently addressed all material requests as documented in Appendix A.

### **2.5.1 Forward Action Requests**

There were no forward action requests during the verification of the previous monitoring period nor during the verification of this monitoring period.

## **2.6 Eligibility for Validation Activities**

RCE did not perform validation activities as part of the verification process.

## **3 VALIDATION FINDINGS**

No validation activities took place during the verification of this monitoring period.

### **3.1 Participation under Other GHG Programs**

The Project does not participate in any other GHG programs.

### **3.2 Methodology Deviations**

There are no methodology deviations for the Project during this monitoring period or any previous monitoring periods.

### 3.3 Project Description Deviations

Second Nature and UWM identified and appropriately justified one project description deviation in the Monitoring Report. RCE approved this project description deviation for the Project during this monitoring period.

The validated Project Description states that the Project applied energy efficiency technologies that require project emissions adjustments and that Test C would be applied for project year 1 and Test D would be applied for years 2 to 10. Under Test C, project emission adjustments are zero. The project proponent projected that Test C would not be passed after the first year; however, Test C was passed for year 2, this monitoring period, and therefore project emission adjustments are zero. Second Nature and UWM appropriately identified this as a project description deviation in the Monitoring Report. Per the methodology, project proponents may estimate the project emissions adjustments using any of the adjustment tests.

RCE approved this deviation because it does not impact the applicability of the methodology, additionality, or appropriateness of the baseline scenario, and the Project remains in compliance with VCS rules.

### 3.4 Grouped Project

N/A, this is not a grouped project.

## 4 VERIFICATION FINDINGS

### 4.1 Project Implementation Status

The Project start date is 1 July 2015, as stated in the validated Project Description. The crediting period is for ten years, beginning on 1 July 2015 and ending on 30 June 2025. RCE found that the Project was implemented in conformance with the validated Project Description except for the noted deviation. RCE verified that there were no previously validated methodology deviations and confirmed that the Project continues to meet the requirements of the VCS Standard Version 3.7.

RCE confirmed that there were no changes to the project proponents for this monitoring period. The Project Proponent—The Board of Regents of the University of Wisconsin System, for the University of Wisconsin Milwaukee—is identified in the Monitoring Report. Second Nature is involved as the manager of the Presidents' Climate Leadership Commitments (previously known as ACUPCC) platform and to provide technical assistance. Project ownership was assessed during the validation and the Project Proponent continues to hold the rights to the equipment and project activities that generate GHG emission reductions. Additionally, UWM has not sought or received any other form of environmental credit.

The Project does not rely on any internal monitoring or metering equipment to collect data required for emission reduction calculations. Data sources include utility data for natural gas, purchased electricity, and purchased steam.

## 4.2 Accuracy of GHG Emission Reduction and Removal Calculations

Second Nature and UWM calculated the Project's emission reductions in accordance with the equations in VCS Methodology Module VMD0038 and the validated Project Description. Emission reductions were calculated using the Chevrolet-developed Microsoft Excel calculator. RCE reviewed this calculator and the inputs for this monitoring period to ensure the accuracy of the inputs. RCE reviewed a sample of selections of the Project's raw data sets to ensure the accuracy of the inputs and to ensure that there were no transcription errors.

The primary Project data includes the campus' annual GHG emissions from scope 1 stationary combustion and scope 2 purchased electricity. Purchased steam data is also used to assess potential increases in scope 2 purchased steam emissions for project emission adjustments, if necessary. RCE reviewed samples of natural gas invoices since natural gas accounts for all the campus' stationary combustion emissions and reviewed samples of monthly purchased electricity via screenshots of the electric provider's online account information for UWM.

RCE also reviewed UWM's assessment for project emission adjustments. As discussed above in Section 3.3, UWM identified a project description deviation since adjustment Test C was used instead of adjustment Test D as stated in the Project Description. Potential increases in scope 2 purchased steam emissions are evaluated by assessing whether any of the activities undertaken to reduce stationary combustion emissions resulted in a net increase in scope 2 purchased steam emissions. RCE reviewed the purchased steam summary against the validated baseline purchased steam quantities and confirmed that the increase in emissions is below the 5% of total stationary combustion emissions threshold.

Any requests for additional documents and data, as documented in RCE's List of Findings (Appendix A) were addressed by Second Nature and UWM.

RCE calculated the emission reductions for the monitoring period using the Chevrolet-developed Microsoft Excel calculator and found the baseline emission, project emission, and GHG emission reduction calculations to be in conformance with the methodology VM0025, the methodology module VMD0038, and the validated Project Description and to be free of material misstatement.

## 4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

Second Nature and UWM provided adequate documentation for the emission reduction calculations as well as the Project's information control systems, data management processes, and data quality assurance procedures. RCE reviewed the Project's Monitoring Report, GHG inventory as submitted to ACUPCC, supporting utility data for the GHG inventory, and emission reduction calculations as calculated in the Chevrolet-developed Microsoft Excel emission reduction calculator. Additionally, RCE interviewed Project personnel to assess their competency and understanding of the Project and data outputs including data management. RCE verified that the Project Proponent ensures that project documents and records are secure and retrievable for at least two years after the crediting period.

RCE found the information provided to be transparently documented and in accordance with requirements of the methodology and the validated Project Description

#### **4.4 Non-Permanence Risk Analysis**

Not applicable to this project.

### **5 SAFEGUARDS**

#### **5.1 No Net Harm**

No negative environmental or socio-economic impacts were identified by the project proponent.

#### **5.2 Local Stakeholder Consultation**

There are no records of ongoing communications with local stakeholders during this monitoring period. As stated in the validated Project Description, stakeholder comments were incorporated into the development of the performance methodology.

## 6 VERIFICATION CONCLUSION

RCE conducted a risk-based verification of the University of Wisconsin Milwaukee Campus Wide Clean Energy & Energy Efficiency Project including a strategic review and analysis of the Project data, documentation, and emission reduction calculations. RCE concludes to a reasonable level of assurance that the GHG assertion is free of material misstatement. The emission reductions for the monitoring period 1 July 2016 to 30 June 2017 can be considered in conformance with the following criteria:

- Verified Carbon Standard Version 3.7, 21 June 2017,
- VCS-approved methodology VM0025: Campus Clean Energy and Energy Efficiency, Version 1.0, 12 February 2014,
- VCS Approved Methodology Module VMD0038: Campus Clean Energy and Energy Efficiency: Campus-Wide Module, Version 1.0, 12 February 2014, and
- Validated VCS Project Description, dated 24 July 2017
- ISO 14064-3 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"

Verification period: From 1 July 2016 – 30 June 2017

Verified GHG emission reductions and removals in the above verification period:

| Year                                              | Baseline emissions or removals (tCO <sub>2</sub> e) | Project emissions or removals (tCO <sub>2</sub> e) | Leakage emissions (tCO <sub>2</sub> e) | Net GHG emission reductions or removals (tCO <sub>2</sub> e) |
|---------------------------------------------------|-----------------------------------------------------|----------------------------------------------------|----------------------------------------|--------------------------------------------------------------|
| Project Year 2:<br>1 July 2016 to<br>30 June 2017 | 30,750                                              | 26,625                                             | 0                                      | 4,125                                                        |

## 7 LEAD AUDITOR SIGNATURE



Michael Coté

## 8 INTERNAL REVIEWER SIGNATURE



Nina Pinette

## APPENDIX A: VERIFICATION FINDINGS

| Corrective Action Requests (CARs), Additional Documentation Requests (ADRs), and Clarification Requests (CRs) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ID #                                                                                                          | Action Item                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Resolution                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| CAR 1, material                                                                                               | The project emission adjustment is based on Test C, rather than Test D as stated in the validated project description. Update section 2.2.2 of the Monitoring Report to appropriately justify this deviation.                                                                                                                                                                                                                                                                                                     | 29 March 2018: UWM provided an updated Monitoring Report that appropriately identifies this project description deviation.                                                                                                                                                                                                                                                                                                                                                                                |
| CAR 1, non-material                                                                                           | It is unclear how the purchased thermal energy total input to SIMAP (32,812 MMBtu) and used for the steam adjustment in the calculation tool was derived from the file "GLRF_SFS_Steam Use Export.xlsx" which contains steam used in units of mlbs. Verifier's conversion from mlbs to MMBtu does not equal 32,812.<br>Purchased steam is less than 5% of stationary combustion emissions using either MMBtu total so this has no effect on the calculation of emission reductions. The project passes this test. | 23 March 2018: UWM explained that the file GLRF Steam Use Export.xlsx is document from the utility to verify steam used at the GLRF facility. The conversion to MMBtu is in another workbook which also contains data for the other UWM steam-heated facility.<br><br>Verifier did not initially add the steam from SCE. The conversion from mlbs to MMBtu is correct, and the sum of the steam from both steam-heated facilities is 32,812 MMBtu.                                                        |
| ADR 1                                                                                                         | Provide additional supporting data for the emissions in the SIMAP export – i.e. fuel quantities, emission factors, etc.                                                                                                                                                                                                                                                                                                                                                                                           | 15 March 2018: UWM provided additional files from SIMAP which contain emissions totals, energy by source, and emissions factors.                                                                                                                                                                                                                                                                                                                                                                          |
| ADR 2                                                                                                         | Provide an updated Monitoring Report <ul style="list-style-type: none"> <li>Table on p. 1, update the Project ID</li> <li>Section 1.1, p. 5, Average baseline emissions for FY2017 need to be updated</li> <li>Also update per CAR #1 above.</li> </ul>                                                                                                                                                                                                                                                           | 29 March 2018: UWM provided an updated Monitoring Report with updated Project ID, updated baseline emissions, and                                                                                                                                                                                                                                                                                                                                                                                         |
| ADR 3                                                                                                         | Provide the final emissions reductions calculation tool from the previous monitoring period.                                                                                                                                                                                                                                                                                                                                                                                                                      | 23 March 2018: UWM provided the tool, and RCE confirmed that the values carried over from the previous monitoring period and the baseline are appropriate.                                                                                                                                                                                                                                                                                                                                                |
| CR 1                                                                                                          | The emissions reported for purchased electricity in the emission reduction calculator do not match the emissions for purchased electricity in the SIMAP export. Verifier independently calculated emissions using kWh total and SIMAP emission factors and the calculated emissions match what was input to the emission reduction. Explain this discrepancy in the SIMAP report, since that is the source of data for the emission reduction calculations.                                                       | 9 April 2018: UWM provided an explanation and updated exports from SIMAP.<br>The emissions reported for purchased electricity in the emission reduction calculator and in SIMAP are not still supported by the total kWh for purchased electricity in the energy utility spreadsheet multiplied by the SIMAP emissions factors for CO <sub>2</sub> , CH <sub>4</sub> , and N <sub>2</sub> O; however, the emission reductions calculated for this monitoring period are not affected by this discrepancy. |

|      |                                                                                                                                                                                   |                                                                                                                                                                                                                                |
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| CR 2 | Explain how the “Main Campus Parcels and Area” spreadsheet supports the square footage input to the emission reduction calculator for this monitoring period (7,905,871 sq. ft.). | 23 March 2018: UWM responded that the “Main Campus Parcels and Area” file is provided as an overview of UWM properties. All the square footage data and explanation is provided in the “Total Building Square Footage” folder. |
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