CFTC Implementation of Executive Order 13514

Reductions in Scope 1 & 2 GHG Emissions by 2020

CFTC is exempt from this requirement (100% leased facilities, no significant vehicle fleet).

Reductions in Scope 3 GHG Emissions by 2020

CFTC's opportunities to contribute to Scope 3 GHG reductions fall into two major areas—facilities and travel. These are discussed in more detail below.

Facilities:

- CFTC is a small agency with offices in four locations, Washington, DC; New York, NY; Chicago, IL and Kansas City, MO. All are housed entirely within leased space. While being a tenant limits our ability to influence how the facilities themselves are operated, we have made a conscious effort over the years to consider the energy and environmental impacts of our lease decisions. In fact we are currently soliciting offers for new space in both New York and Kansas City and the extent to which the facilities manage building systems to minimize the consumption of energy, water and materials is explicitly included among the evaluation criteria. In the spirit of paragraph 2(f) of the EO regarding regional and local planning, we have also included access to public transportation and pedestrian-friendly environment among the amenities to be considered in making a selection.
- We have developed effective relationships with our building managers in all locations, providing fora for the exchange of ideas and priorities. This has given us the opportunity to share our interest in energy efficiency and environmental stewardship in a way that results in positive change. For example, we have reviewed EO 13514 in great detail with the manager of our largest facility (DC). The manager has voluntarily developed an action plan to implement policies and procedures that comply with the intent of the order as much as reasonably possible. A copy is enclosed. We also actively participate with the "Green Office" program at our New York location. A copy of that is enclosed as well.
- CFTC is currently undergoing a period of extensive and rapid expansion of its operations and facilities in response to changes in the laws governing the regulation of markets. This has required extensive modification of some of our facilities, most notably in Washington and Chicago. In considering how to approach the necessary construction, considerable thought has been given to energy efficiency and environmental impact. For example, we have minimized the amount of alteration to our existing facilities needed to accommodate our new workforce structure. In doing so we have taken advantage of the required construction to upgrade HVAC systems, lighting systems and plumbing where applicable to increase energy efficiency and reduce water usage. Where appliances and equipment are no longer serviceable or approaching the end of their life cycle, we have sought LEED certification, typically at the silver level—gold where technically feasible and economically justified. Detailed supporting documents are available if needed. Construction activities themselves

are monitored to minimize waste and reduce the requirement for long distance delivery of materials, furniture and equipment.

• Regarding operation of our facilities, we have seen significant efforts to reduce energy use, waste and water usage. This has been accomplished through a combination of technology and policy. For example, most rooms have motion sensing light switches. Individual space heaters are not allowed. Nearly all plumbing fixtures have automatic, low-flow valves. Employees are admonished to turn off devices not in use. Office paper, metal and plastics are recycled and closely monitored by the building managers. Even small details like providing alcohol-based hand sanitizers are employed to reduce water consumption and waste paper.

Travel:

CFTC employees commute and some must travel between office locations as a routine part of conducting business. To reduce the need for travel, increase operational efficiency and provide a positive work environment, CFTC employs a number of programs, policies and strategies. These also tend to reduce energy consumption.

- By far the most significant travel impact is associated with commuting. Of our four locations, only the smallest in Kansas City is not readily accessible by public transportation. To encourage the use of public transportation, CFTC participates in a transit subsidy program. Currently 77% of eligible CFTC employees participate in this very popular program.
- CFTC allows flexible work schedules. This program reduces the number of days employees must commute.
- CFTC also allows telework on a regular basis for some employees and episodically for others. This too reduces the need for employees to commute. With the long commuting distances typical of our three largest offices (DC, NYC and Chicago), even a small reduction in the number of trips can have a meaningful impact in reducing energy consumption and production of GHG.
- Business travel has been significantly reduced by the application of videoteleconferencing technology, which all four of our offices employ routinely. Where travel is unavoidable, we typically make an effort to combine as many activities as possible into a given trip. For example, combining a trip to our Kansas City and Chicago offices from DC saves a significant number of flight miles vice two separate trips.

Electronics Stewardship (ref. also E.O. 13423)

✓ More than 95% of current CFTC equipment addressed by <u>Electronic Product</u> <u>Environmental Assessment Tool</u> (EPEAT) (workstations, displays, notebooks) meets EPEAT requirements.

- * CFTC computers and monitors are configured for performance rather than power saving *based on mission need to support telework and effective mobile computing.*
- * CFTC does not have policies that specifically address extending the useful life of electronic equipment.
- ✓ CFTC uses GSA to dispose of electronic equipment.
- ✓ CFTC complies with the following <u>requirements of the Federal Electronics Challenge</u>:
 - Find energy efficient electronic equipment.
 - Require energy efficient electronic equipment in acquisition and procurement documents.
 - Develop or update purchasing policies, procedures and guidance, to require acquisition of energy efficient electronic equipment.
 - Gather information about electronic equipment that must be power managed (computer desktops, notebooks/laptops and monitors).
 - Investigate implementation options for local and/or network power management.
 - Activate power management (printers and copiers).
 - Enable duplexing (double-sided) features on imaging equipment and connected computers.
 - Streamline acquisition and use of imaging equipment.
 - Reduce resource use by imaging equipment.
 - Extend the life of existing electronic equipment.
 - Evaluate requests for new electronic equipment purchases.
 - Evaluate remote desktop solutions (e.g., thin client) to reduce hardware and software distribution to individual users.
 - Educate employees on how to improve operation and maintenance of electronic equipment.
- * CFTC does not comply with the following requirements of the Federal Electronics Challenge:
 - Record or track annual purchases and leases of energy efficient electronic equipment for necessary reporting.
 - Track and maintain power management settings.
 - Develop or update IT operation and maintenance policies, procedures and guidance, to ensure continued power management.
 - Track power management compliance for necessary reporting.
 - Turn off/power down electronic equipment at the end of each work day and/or over weekends and holidays (*based on mission need to support telework and effective mobile computing*).
 - Limit the number of computers per user to one (either desktop or portable) (*based* on mission need to support telework, effective mobile computing, and improve security by favoring the use of CFTC-controlled rather than personal devices).
 - Evaluate leasing of electronic equipment or seat management.
 - Plan for reuse, donation and recycling during operation and maintenance.

The Future:

While CFTC is proud of its longstanding efforts to plan and operate in an energy-efficient way that minimizes environmental impact, we recognize that as technology changes and our mission evolves, there will be opportunities to do even more in the future. As data on "sustainable contracting" become more readily available for example, we will be alert to opportunities to take advantage of that information. With the very rapid pace of technology improvements in the IT arena, we expect that some of our current limitations like those regarding power management will be overcome without endangering critical mission requirements.