

EN-POWER GROUP

Updated May 2026

LOCAL LAW 88

Lighting Upgrades & Sub-Metering

1. WHAT THE LAW IS

LL88 Quick Facts

Deadline: May 1

Applies to: 25,000+ gross square feet

Required Filing: Attestation of Compliance

Local Law 88 requires covered NYC buildings to upgrade certain lighting systems and install electrical sub-meters in covered tenant spaces. The purpose is to reduce energy waste from outdated lighting systems and improve transparency around tenant electricity usage. The law is implemented through requirements tied to lighting power allowances, lighting controls, and sub-meter installation.

Why the Law Exists

The law requires that all areas within covered commercial and residential buildings – excluding individual residential units – comply with its standards. LL88 was developed in response to the significant role lighting plays in overall building energy use and carbon emissions, with the goal of driving efficiency upgrades and improving visibility into tenant energy consumption.

What Problem It Is Trying to Solve

Many buildings continue operating with inefficient lighting systems or without clear tenant-level electricity visibility. LL88 addresses this by:

- requiring lighting systems to meet current energy code standards
- requiring certain non-residential tenant spaces to be sub-metered

2. WHO MUST COMPLY

Building Size Thresholds	Covered Tenant Spaces
Buildings that exceeds **25,000 gross square feet**	Tenant spaces larger than **5,000 gross square feet** on one or more floors, let or sublet to the same person, or
Two or more buildings on the same tax lot that together exceed **100,000 gross square feet**	Floors larger than **5,000 gross square feet** consisting of tenant spaces let or sublet to two or more different persons.
Condominium buildings under common ownership totaling more than **100,000 gross square feet**	

Notable Exceptions

DOB lists several important exceptions, including:

- one-, two-, and three-family homes or other class one property
- certain garden-style apartments meeting specific system ownership conditions
- dwelling units classified in occupancy groups **R-2** or **R-3** for lighting upgrade and sub-meter installation requirements
- lighting system elements or spaces already compliant with the applicable energy code in certain cases
- covered tenant spaces already measured by a dedicated utility meter for sub-metering purposes.

3. WHAT'S REQUIRED & HOW THE PROCESS WORKS

Actions Buildings Must Take

- Upgrade lighting systems so they comply with the applicable NYCECC standards for new systems
- Install electrical sub-meters for covered tenant spaces
- Prepare and submit the required compliance documentation to DOB.

How the Compliance & Submission Process Works

For lighting compliance, DOB requires an **attestation of compliance** confirming that the lighting system of the entire building has been inspected and upgraded in accordance with the law. For sub-metering compliance, DOB requires:

- an attestation of compliance
- a list of all covered tenant spaces
- a sample monthly statement from each tenant or sub-meter.

Reports are submitted through the **BEAM** portal. DOB states that owners filing LL88 reports are required to pay a **$115 filing fee**, and that the fee covers both lighting and sub-metering reports.

Who Can Certify the Work

DOB states that lighting upgrades and sub-meter installations must be certified by:

- a **registered design professional**, or
- a **licensed master or special electrician**
  confirming that the work was completed and complies with the law's requirements.

How Often Requirements Recur

DOB's current page frames LL88 as a **one-time filing obligation for buildings on the applicable covered buildings list that have not yet demonstrated compliance**. Compliance documentation is submitted once and not resubmitted annually, although annual penalties may apply if required documentation is still missing.

4. KEY DEADLINES

Implementation and Filing Deadlines

LL88's key deadlines have passed.

- Lighting and sub-metering upgrades were required on January 1, 2025
- Compliance reporting was due May 1, 2025

So You Missed the Key Deadlines?

As a result of missing the key LL88 deadlines, your building will have to pay penalties (see more below) for every year that the building does not comply. The good news is that once you comply with the following year's May 1 filing deadline, your building will be all set moving forward.

Important Context

DOB publishes an annual **LL88 Covered Buildings List** and notes that only buildings that have not yet reported compliance are required to file in the relevant filing year.

5. PENALTIES & RISKS

Financial Penalties

The DOB states that buildings that fail to submit required compliance documentation may face annual penalties, including:

- **$1,500 per BIN** for missing lighting controls compliance documentation
- **$1,500 per BIN** for missing sub-metering compliance documentation
- **$500 per missing sub-meter**.

Compliance Risk

Even where upgrades have already been completed, buildings can still fall short if:

- the work did not meet current energy code requirements for LL88 compliance
- the required documentation is incomplete
- the required professional certification has not been obtained.

Operational & Financial Impacts

Delayed compliance can increase costs if buildings wait until stricter codes, limited contractor availability, or compressed filing windows make the work harder to complete. EN-POWER also notes that current standards may be more favorable than future code cycles.

6. HOW THIS LAW CONNECTS TO OTHERS

Planning Overlaps

LL88 often overlaps with:

- broader lighting modernization projects
- tenant energy-use visibility and reporting
- larger building performance and emissions planning efforts.

Why Coordinated Action Matters

Lighting and controls upgrades can support broader energy performance goals, while sub-metering improves visibility into tenant electrical consumption. In practice, LL88 work is often more efficient when coordinated with other capital or compliance efforts rather than treated as a standalone filing.

7. WHAT EN-POWER GROUP RECOMMENDS CONSIDERING

Many buildings assume LL88 is already satisfied because lighting has been upgraded at some point in the past. In practice, the real question is whether those upgrades meet the applicable code standard and whether the documentation needed for DOB filing is complete. EN-POWER's page specifically points users to questions around controls, light power density, sub-metering, documentation, and professional sign-off.

Common Planning Considerations

- confirm whether prior lighting work actually satisfies LL88 requirements
- identify which tenant spaces are covered for sub-metering
- gather documentation early, especially where multiple tenants or meters are involved.

Best-Practice Approaches

- review the DOB covered buildings list to confirm if your building is covered (i.e., required to comply with LL88)
- verify scope before assuming the building is already compliant
- coordinate design, installation, certification, and filing work with trusted consultants and contractors

Questions Decision-Makers Should Be Asking

- Are our lighting systems already compliant under current standards?

- Which commercial spaces are covered tenant spaces?
- Do we have the documentation and certifications needed to file?

Many Buildings Assume They've Already Met LL88 Requirements – Until They Review What's Actually Required

- Lighting upgrades and sub-metering are often partially completed.
- The challenge is not just completing the work – it's confirming that it meets current requirements and is properly documented.

8. HOW WE SUPPORT BUILDINGS LIKE YOURS

We help buildings:

- Evaluate existing lighting systems and controls
- Determine sub-metering requirements
- Verify compliance with current standards
- Prepare and submit required documentation

START WITH A CONVERSATION

If you're unsure whether your building is fully compliant or need help navigating the filing process, we can help clarify your next steps.

☞ **Schedule a Consultation** with Director of Business Development Mitchell Karasik

✆ 646.290.6289 | ✉ mvkarasik@enpg.com