

## Finlayson, Ian (ENE)

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**From:** Douglas Flandro <dflandro@gmail.com>  
**Sent:** Tuesday, 9 August 2022 3:47 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** BUILDING CODE COMMENTS

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Dear Commissioner Woodcock,

Electrification is possible on a large scale for all residential and commercial buildings, both for new construction and for building renovations. I agree with Attorney General Maura Healy that the best way to meet or state's climate goals in a way that is equitable and protects all our state's consumers is for the DOER to allow Massachusetts municipalities the opportunity to impose all-electric requirements. Many municipalities have been asking for this authority for many years and this is the time for the DOER to allow all-electric requirements for communities that choose to opt-in. Fossil fuels can be part of the path to energy efficiency for the base code and the Stretch Energy Code alongside requirements to provide electrical infrastructure but allowing fossil fuels in the Specialized Opt-In Code will unnecessarily restrict communities who wish to be more progressive in their energy goals.

I suggest the following critical improvements to the code language:

- The current timeline for release of the code language does not give municipalities time to adopt the Opt-in code by July 1, 2023. Municipalities should be able to adopt the Opt-in code at any point before July 1 for implementation to begin on July 1.
- The Opt-In code should require on-site renewables for all projects where there is Potential Solar Zone Area.
- We request that the DOER restore embodied carbon requirements that require low embodied carbon materials for all projects and whole building LCAs for large buildings. We need to be gathering this data now for implementation in future codes for embodied carbon reductions.
- Curtainwall buildings should be held to the same efficiency standards as other buildings.. Under the base stretch code, any building that is an All-Electric Building including heating, hot water, cooking, and drying should be allowed to use the more lenient backstop. Under the Opt-In code this pathway should be removed, all buildings should be All-Electric, and all buildings should meet the more stringent backstop requirement. If a project team wants to use curtainwall, they must innovate to meet the backstop, TEDI, and EUI requirements.
- Pair TEDI limits on heating and cooling with EUI limits which require lighting, pumps, plug loads and other energy use efficiency. Set EUI limits by building type at least equal to those in the IECC 2021 Base Code Appendix "Zero Code."
- Provide models showing how these code updates will meet the 2025 and 2030 sector emissions limits and update previous cost studies based on current electric and gas prices.

Sincerely,

Douglas Flandro  
Sustainable Design Leader

CambridgeSeven