

Maggie McCarey
Director, Energy Efficiency Division
Department of Environmental Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

9 August 2022

Re: Draft Stretch Energy Code Regulations

Dear Director McCarey:

I am writing to provide public comments on the DOER draft code language for the Stretch Energy Code and Specialized Municipal Opt-in Code.

The International Association of Lighting Designers (IALD) is the leading global organization of lighting designers. We rely on our extensive experience and knowledge of lighting technology and human visual performance to provide comfortable, safe and environmentally sensitive lighting for building occupants and the public. The IALD has over 40 members in Massachusetts, who practice at 15 lighting design firms. Additionally, many of our members outside of the Commonwealth design the lighting for projects located in Massachusetts.

Through design practice, lighting designers ensure that lighting is used in a responsible manner to minimize energy use. IALD members advocate for energy conservation and actively participate in the development of the International Energy Conservation Code (IECC), ASHRAE/IES Standard 90.1, and, at the state level, in Massachusetts, New York, California and other states.

The IALD supports the implementation of an effective Stretch Energy Code and has the following comments:

MA 2023 Commercial Stretch Code and Specialized Opt-in Code DOER Draft 6-24-2022

Comment #1

Page 6, C401.2.1 #3, Relative Performance Compliance

Revise first sentence as follows:

This pathway may be used by buildings not required to use ~~either~~ Option ~~1~~ or 2.

Reason: Option 1 is never *required*.

Comment#2

Page 11, C402.5.1.2 #4

In the first sentence, shouldn't the reference be to C402.5.9?

Comment#3

Page 31, C407.2.2.2 Modification to ANSI/ASHRAE/IESNA 90.1-2019 Chapters 5 and 9

Where are these modifications? There is nothing below this line. Please provide these modifications for public review.

Comment #4

Page 35, C503.1 General

Revise first sentence as follows:

Alterations to any building or structure shall comply with the requirements of Section C503, ~~and Sections C402, C403, C404, C405 of the code for new construction.~~

Reason: This proposed addition to IECC 2021 is unnecessary, and will create a conflict and confusion as to what is required. The requirements to follow specific provisions of Chapter 4 are listed separately in C503.2, C503.3, C503.4 and C503.5.

MA 2023 **Residential** Stretch code and Specialized Opt-in code DOER Draft 6-24-2022

Comment #1

Page 3, R202, High-Efficacy Lamps

Do not modify this definition. Leave as-is in IECC-2021

Reason: The definition that you are proposing to modify is not the definition that is in IECC-2021, R202. In any case, the definition should not limit the technology to one type (LED) for two reasons. First, this could discourage the use of any future high-efficacy technology that might come along. Code should mandate performance, but not favor specific technologies. Second, all lamp types *other than* LED (such as incandescent and fluorescent) would be unregulated, because they are not specifically listed.

Thank you for your consideration. If you have any questions, please contact me by email or phone as noted below.

Respectfully submitted,



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