

## Finlayson, Ian (ENE)

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**From:** Richard Keleher <kel@rkeleher.com>  
**Sent:** Thursday, 28 July 2022 10:31 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments on Proposed Stretch Code

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Hi DOER,

I want to thank you for the excellent work you have done to date on developing the new stretch codes. However, more work still needs to be done to Optimize the Opt-In Net Zero Code...

1. Expand the Electrification Requirement: Make electrification a requirement not just for buildings with 50+% curtainwall but for ALL new buildings and major renovations. Not just for homes greater than 4,000 square feet but for all new and substantially renovated homes. Any building built today with fossil fuels will need to be retrofitted at greater cost and complexity before the end of its useful life.
2. Restore the Deleted Embodied Carbon Provisions: For all buildings, require certain cost-effective low-carbon materials. For larger buildings, additionally require Whole Building Life Cycle Analysis reporting.
3. Accelerate Effective Dates: Allow municipal adoption any time before Jan 1st or July 1st effective dates, anticipating possible voting in late December (special session), Spring, or Fall.
4. Clarify and Expand On-Site Solar Generation: For all buildings (not just those heated by fossil fuels), require on-site solar panels in proportion to gross square feet to the extent of available solar access.
5. Clarify the Curtainwall & Electrification Threshold: Define curtainwall area as the entire system including framing, glazing, spandrel panels. Require electrification for buildings with 30+% (not 50+%) curtainwall area.
6. Pair TEDI Limits with EUI Limits by Building Type: Set EUI limits at least equal to those in the 2021 Base Code Appendix ("Zero Code") to prevent manipulation of TEDI calculations and to gain overall energy efficiency.
7. Show How 2030 Building Sector Limits Are Met: EEA recently finalized legally mandated 2025 and 2030 emissions limits. Model progress toward these goals under various growth and opt-in assumptions.
8. Correct Cost Studies & Minimize Life Cycle Costs: Cost studies should be revised to reflect current gas and electricity prices – AND – to add significant cost premiums for retrofitting fossil fuel heated buildings.

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