



Northeast Home Energy Rating System Alliance
PO Box 808
Northampton, MA 01061

March 16, 2022

Department of Energy Resources (DOER)
100 Cambridge Street, Suite 1020
Boston, MA 02114
Attention: Nina Mascarenhas

Re: Stretch Code Straw Proposal Comments

Dear Commissioner Woodcock, Director McCarey, Msrs. Finlayson and Ormond, et al:

The Northeast HERS Alliance Board represents the Home Energy Rating System (HERS) industry with over 250 rater members and 12 provider members in the Northeast. We are writing in support of the Straw Proposal, with a few modifications.

We agree with DOER that the “regular” stretch code should be mandatory and that the municipal opt-in stretch code should be an option at first, instead of a requirement. The HERS Rating industry has the capacity to implement this policy immediately.

In reference to Rachel White’s letter [MA NZB Coalition DOER Stretch Code Straw Proposal Comment Letter 2022-02-20](#) we agree with her recommendation to “account for or curb embodied carbon emissions related to construction,” because adding a requirement to disclose current levels of embodied carbon in buildings will establish a baseline against which future reductions can be compared.

As you know, the MA GWSA/ 2030 CECP / Climate Bill S.9 mandates a 50% MA greenhouse gas emissions reduction by 2030. The embodied carbon emissions are an important part of the emissions that must be addressed in order to reach these targets. Requiring the use of an embodied carbon model and setting required target reductions, would allow municipalities to begin quantifying the needed reductions and demonstrating to their constituents that we are adequately addressing the climate crisis.

Respectfully,

Betsy L. Ames
Executive Director
On Behalf of the Northeast HERS Alliance Board