



March 8, 2022

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

Re: Stretch Code Straw Proposal Comments

Dear Commissioner Woodcock, Secretary Theoharides, and Secretary Kennealy:

I am a home energy consultant, a long-time town energy committee member, and a climate advocate with Climate Action Now of Western Massachusetts, committed to making buildings across our Commonwealth elements of how we are addressing the climate crisis rather than ongoing and new sources of greenhouse gas emissions. The building energy code is a powerful means of accelerating this shift, one that ensures that change addresses historic inequities in housing in environmental justice and low and moderate income communities.

The draft Specialized Opt-In Stretch Code that DOER presented for public review on February 8th is inadequate to support such a critical and rapid transformation. The allowance of fossil fuels for newly constructed buildings is at odds with professional definitions of net zero, and it ensures that residents and owners of new buildings will still have to incur future costs of transitioning to efficient all-electric systems. In the meantime, new buildings with fossil fuel heating and other appliances would expand fossil fuel use and increase greenhouse gas emission likely for decades.

As you know, net zero energy buildings are being constructed now, have minimal to no additional upfront costs, significantly lower operating costs, much lower immediate and long-term GHG emissions, and healthier indoor air quality.

I ask that DOER adhere to the mandate in the 2021 Next Generation Roadmap law by developing a net zero stretch energy code that:

- Is implemented in January 2023.
- Ensures new buildings are truly net zero, constructed with:
 - High energy efficiency that lowers the need for energy use and increases resiliency.
 - Efficient, all-electric heating/cooling and cook stoves and either heat pump water heaters or solar hot water.

- Renewable energy on or off-site.
 - Building materials that have currently available low embodied carbon such as lower GHG-emitting refrigerants and low-carbon concrete, to prevent embodied carbon in building materials from being a high source of upfront GHGs that can take years and even decades to make up in operational emissions savings.
- Also applies to existing buildings with major rehabilitation projects.
 - Requires all buildings to install efficient heat recovery or energy recovery ventilation for occupant health.
 - Allows only Green Communities who adopt the net zero stretch code to be eligible to compete for the entire pool up to \$10 million in the first round of their grant applications following adoption of this code and provides communities with three years to adopt the code. Or, alternatively, Green Communities are required to adopt the net zero stretch code within three years to be eligible for Green Community grants.

A true net zero energy building code is essential to meeting our Commonwealth's 2030 and 2050 mandated greenhouse gas emission (GHG) targets, and accelerated electrification of buildings is featured as a key component of the Massachusetts Clean Energy and Climate Plan designed for achieving the *critical* interim 2030 GHG objective.

The United Nations Environment Programme's executive director, Inger Andersen recently said, "We need nations, cities...and every actor to turn this step into a sprint if we are to keep 1.5 °C within reach and help communities and nations adapt to climate impacts." Now is the time to act as boldly as possible!

Thank you for considering these recommendations for strengthening the Specialized Stretch Code to make it a true net zero code and lead us in this climate crisis.

Sincerely,
Sally Pick