

Finlayson, Ian (ENE)

From: Isaac Elnecave <ielnecave@phius.org>
Sent: Friday, 18 March 2022 3:59 PM
To: STRETCHCODE (ENE); Graham Wright; Lisa White; Katrin Klingenberg
Subject: Preliminary Comments on the Straw Proposal

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Dear Mr. Finlayson:

Following are the preliminary comments on the Massachusetts DOER Straw Proposal-- we will expand on these notes in formal comments next week:

1. We would like DOER to consider changing the TEDI requirement. Instead of using absolute TEDI values, Phius feels that structuring the requirement as relative i.e. comparing results against a baseline building will make the design process more manageable for designers.
2. We would like to see a formal cooling standard included. In our experience, Phius has found that both heating and cooling must be taken into account in the Massachusetts climate.
3. Phius requests seeing the underlying data for the determination that the curtain wall U-value requirement is not being strengthened. This determination has the potential of making the TEDI requirements very difficult to meet and may open up a significant loophole in the code.
4. Phius believes that DOER should incorporate a tracking/data gathering mechanism for embodied carbon as a first step in its regulation. It will be important to collect data in order to develop meaningful regulations on this issue.
5. Phius believes that DOER has to quantify the amount of PV that will be required in single family homes that are using fossil fuels.

As noted above, Phius will submit a more formal and detailed set of comments next week on these issues. Thank you for your consideration.

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