

Finlayson, Ian (ENE)

From: Jacob Bloom <JBLOOM@cambridgeseven.com>
Sent: Thursday, 17 March 2022 5:53 PM
To: STRETCHCODE (ENE)
Subject: Stretch Code Straw Proposal Comments

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Thank you for the work you've done in putting together these updated energy codes. Here are my comments:

1. The new TEDI method of energy benchmarking seems good. I look forward to seeing how it is developed.
2. The new targets for the stretch code are a major improvement over previous versions.
3. While setting benchmarks for mechanical loads is great, these codes must also limit other energy demands such as DHW, lighting, and plug loads.
4. The base code and stretch code should require all projects to be all electric ready. Anything less is placing a financial burden on future owners when they need to upgrade their systems.
5. All 3 codes must address major renovations. As the straw proposal points out, the majority of buildings that will exist in 2050 are already built.
6. The net zero code does not meet any definition of "net zero." To say that a building can be converted in the future to all electric systems by the time the grid is carbon neutral does not meet the requirements of the climate bill passed last march. The net zero code must produce a viable definition of "Net Zero" as required by the climate bill.
7. The net zero code must require buildings to be all electric now, not some unknown point in the future.
8. The net zero code should require buildings to maximize on site electricity generation and integrate demand response flexibility.
9. There should not be an exception for curtainwall buildings. If a project wants to be made with all glass, the project team must innovate to make that building as efficient as any other façade.
10. The net zero code should require an embodied carbon life cycle analysis of all buildings so that data can be collected for future code benchmarks. If sufficient data is available now, a maximum kgCO2e/sf should be established for primary building materials.
11. Municipalities should be able to fully implement the new net zero code in January 2023.

Thank you again for your work on this.

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