
From: Zemel, Felix (DPS)
Sent: Wednesday, June 15, 2016 2:30 PM
To: Carley, Stephen (DPS)
Cc: Zemel, Felix (DPS)
Subject: FW: 8th Edition Code-Energy Provisions

Felix J. Zemel
Department of Public Safety
Technical Director / Acting Chief of Inspections -- Building

From: Jason Stoots [mailto:jstoots@dpw.state.nj.gov]
Sent: Wednesday, June 15, 2016 12:24 PM
To: 'Matthew Anderson'
Cc: Zemel, Felix (DPS); Carley, Stephen (DPS)
Subject: RE: 8th Edition Code-Energy Provisions

Matt,

Just following up, as a member of Home Builders I wanted to comment on these issues.

Agreed, car charging should be as needed in real time, not required, I'm in this business and can't count the number of chargers we've done on one hand in fifteen years.

The solar access zone is a gift to future homeowners, the number of folks we have visited within fifteen years that couldn't but wanted is great, maybe +35%. Since we crawled out of the cave we have oriented our abodes to the Sun. It's reliable at 4.5 billion yrs old and powerful, enough ground watts in one hour to power all 7 billion of us for a year. Providing some southerly facing roof somewhere should be part of our codes. We shouldn't have to be crazy about this either, It could be anywhere from 90degE to 270degW, that's half the compass, some part of a roof should be in there.

The higher the ratings on HERS, ducts and windows the better those homes perform "in theory", until everyone is up to speed with materials and methods it may not always be perfect but willing interested builders are getting it done now, we're seeing it! I realize that many builders don't care at all and will always be annoyed anytime anyone mentions anything new. But when it's done right, we will be delivering homes that are evenly always comfortable and have extremely low cost of operation. The lower cost of operation is for the life of that structure and a monthly reminder for folks that their builder was amazing. Yes, it cost more day one but days two - end of life is savings that far, far exceeds the day one extra. It's really just presentation, our clients will get it and we will sell and install more material and they will greatly appreciate that as long as they pay utilities. That savings is a local benefit, globally we all benefit when less power is required which makes these proposals a win, win, win to be cliché.

“Liz Kovach, HBRACC member & past president, and current State Assn president along with several other members from across the state will attend this meeting to testify against these proposed amendments which, if adopted, will continue to drive up the costs for housing. We have been informed that there will be about 300 pro solar ready and pro electronic vehicle charging station ready proponents at tomorrow's BBRS meeting.”

Home Builders has pro solar members in the group, sounds like I am one of those losers. I'm disappointed, my Grandpas were builders, my dad was a builder, I grew up building, but we don't build like they used to anymore because like all industries we evolve. Evolution yields more efficiency, it's fundamental to existence, that law can never be rewritten. I've been a member of home builders since college. I want to be a member and support this group but it is clear there's no room for us and that we don't agree much on this Energy Code.

Respectfully,

Jason Stoots
E2 Solar Inc.

From: Matthew Anderson [mailto:matthew@e2solar.com]
Sent: Tuesday, June 14, 2016 12:26 PM
Subject: 8th Edition Code-Energy Provisions

Dear Members;

Today the Board of Building Regulations and Standards (BBRS) will hold a hearing at 1:00 PM to provide an opportunity for public comment and/or testimony related to the proposed adoption of the 2015 International Energy Conservation Code (IECC), as an amendment to the eighth edition of the Massachusetts State Building Code, 780 CMR.

The 8th Edition amendments include new energy conservation provisions which require among other things:
1) a lower HERS rating for new construction;

- 2) one or more electric vehicle 40 amp wired circuits for electric vehicle charging, depending on number of dwelling units in the building;
- 3) certified testers for whole house or duct air leakage; and,
- 4) more energy efficient fenestration (U-factor lowered from .32 to .30); and,
- 5) for new construction buildings, plans will require that a zone of the roof area be designated as the SOLAR-READY ZONE for the future installation of a solar photovoltaic or solar thermal system, with limited exceptions.

Liz Kovach, HBRACC member & past president, and current State Assn president along with several other members from across the state will attend this meeting to testify against these proposed amendments which, if adopted, will continue to drive up the costs for housing.

We have been informed that there will be about 300 pro solar ready and pro electronic vehicle charging station ready proponents at tomorrow's BBRS meeting.

Please send an email to Felix Zemel voicing your opposition to these amendments. Please use the below points provided by Guy Webb, EO of Central MA, who will testify today to the BBRS explaining why we oppose these amendments. Thank you to President Liz Kovach, Guy Webb, Scott Colwell, and former HBRAMA President and BBRS Member Michael McDowell for their tireless efforts to prevent the adoption of burdensome new requirements for our building industry.

Felix I. Zemel, MCP, MPH, CBO, RS, DAAS
Department of Public Safety
Technical Director / Acting Chief of Inspections -- Building

One Adams Street
Boston, MA 02108
Tel: 617-725-5250

After careful review of the proposed requirement referenced above I wish to express some concerns. I am opposed to the adoption of the provision for the reasons stated below.

1. Authority

It is my opinion that the proposed requirement referenced above does not fall under the scope of the powers and duties of the BBRS as provided by M.G.L. ch. 143, sections 94 and 95. It is unrelated to the BBRS's mandate of life safety/public safety and does not provide for energy conservation of the home.

2. Cost

The majority of new single family and two-family homes are built with a 200amp electrical service in which the entire panel is in use. A provision that mandates an open 40amp slot be provided would more often than not require either the addition of a sub-panel or an upgrade to the electrical service to 300amps, an additional cost of approximately \$1,000.

3. Applicability

It is extremely likely that the vast majority of those who purchase an electric vehicle, either now or in the near future, will live in an existing structure that is highly unlikely to have an electric vehicle charging station. Consumers who choose to purchase an electric vehicle do so with the full knowledge that it will

someday need to be recharged and will make the necessary changes to their home. It is in most cases no more expensive to add an electric vehicle charging station to an existing home than to a new home.

Further, as other technologies such as fuel cells advance, the demand for electric vehicles may never reach the level that seems to be assumed by the proposed mandate.

Regarding new single family homes - Builders are very responsive to the market and the demands of their customers. They will provide electric vehicle charging stations voluntarily as demand escalates. The current demand for electric vehicle charging stations is extremely low but if it does increase, builders will quickly prepare their homes with the necessary infrastructure as part of their normal standard features.

4. Summary

In short, it makes no sense to require electric vehicle charging station infrastructure in new 1 and 2 family homes when it will add cost to the home, may never be used, and is easily added post-construction if the homeowner chooses to do so. Furthermore, as noted above, the BBRS does not have it within their powers and duties as authorized by the Legislature to issue such a mandate as part of the Building Code.

Matthew Anderson, President
Home Builders & Remodelers Association of Cape Cod

