



March 18, 2022

Department of Energy Resources
100 Cambridge St, Suite 1020
Boston, MA 02114

Re: Stretch Code Straw Proposal Comments

Dear Commissioner Woodcock,

Thank you for the opportunity to offer comments on the straw proposal for the updated stretch code and the new specialized stretch code. I am writing on behalf of Environment Massachusetts, the statewide environmental advocacy organization. We work to protect clean air, clean water, and open spaces, together with our thousands of citizen members and supporters.

The energy we use to heat, cool, and provide electricity for our buildings is responsible for more than 40 percent of Massachusetts' greenhouse gas emissions. The oil and gas we burn in our buildings is also a major source of harmful air pollution. Exposure to this pollution inside and outside our homes is linked to a wide range of health problems, including asthma, heart attack, and preterm birth.

We can make our buildings much more energy-efficient and replace fossil fuel heating systems with clean alternatives like heat pumps — and the easiest place to start is with new buildings. Every new building is an opportunity to put Massachusetts on a path to a cleaner, healthier future. Building fossil-fuel-free, highly efficient new buildings will also help to expand the market and bring down costs for the technologies that are needed to retrofit existing buildings.

Massachusetts' building codes should require new buildings in every community to meet high standards for energy efficiency and use clean heating and cooking technologies. In the short term, allowing municipalities to opt into these requirements is an important step forward.

At this stage, we are offering feedback on three aspects of the proposed codes:

The specialized stretch code should require fossil-fuel-free construction.

Every new home or commercial building that is built with gas heating today will need to be retrofitted with electric heating over the coming decades in order to meet Massachusetts' climate goals. This only adds to the considerable logistical and cost challenges facing the Commonwealth as we transition away from fossil fuels. Additionally, a growing body of research links the fossil fuels we use in our homes — particularly for cooking our food — to poor indoor air quality and negative health outcomes.

Rather than exposing residents to dangerous pollution and mandating potentially costly retrofits down the road, it makes much more sense to require fossil-fuel-free, all-electric construction up front. Several cities and towns have already expressed an interest in requiring all-electric construction for new buildings. But the current straw proposal falls short, allowing fossil fuels in new construction even in municipalities that adopt the specialized stretch code.

DOER should modify this proposal to require fossil-fuel-free construction in all residential and commercial buildings in communities that adopt the specialized stretch code.

The specialized stretch code should require rooftop solar on all suitable buildings.

Massachusetts has tremendous potential to generate clean electricity from rooftop solar panels. Requiring solar panels on the roofs of all new homes would add more than 2,300 megawatts of solar generation capacity by 2045, according to a report from the Environment Massachusetts Research & Policy Center.¹

Requiring solar to be installed at the time of construction may help to lower the cost of going solar when compared to installing solar panels at a later date. It is typically cheaper to install solar panels when workers are already on the roof. Builders and architects can also consider how to maximize rooftop solar exposure when they design a new building.

The proposed specialized stretch code would require rooftop solar only on homes that are heated with fossil fuels. This requirement should extend to all new residential and commercial buildings where there is suitable rooftop solar exposure. DOER should also set requirements for the minimum amount of rooftop solar to be installed on each type of building.

The stretch code should set high standards for energy efficiency.

The cleanest form of energy is the energy we never use in the first place. As we work over the coming decades to clean up Massachusetts' electric grid and replace fossil fuel heating systems with pollution-free technologies, our task will be much easier if we take advantage of every opportunity to reduce energy consumption through efficiency and conservation.

¹ *Solar Homes: The Next Step for Clean Energy*, Rob Sargent and Bret Fanshaw, Environment America Research & Policy Center and Abi Bradford and Jonathan Sundby, Frontier Group, December 2018, <<https://environmentmassachusetts.org/feature/ame/solar-homes>>.

In 2008, the Green Communities Act established the stretch code with a goal of minimizing the cost of operating buildings through energy efficiency. While the specialized stretch code is an important new tool empowering communities to go further on green building construction, the original stretch code must also help to drive progress. A strong update to the stretch code will result in cleaner, more efficient buildings in the nearly 300 cities and towns that have already adopted the stretch code

We applaud DOER for considering strong efficiency standards for residential and commercial construction in the straw proposal. We encourage the Department to maintain and, where possible, strengthen requirements for efficient building envelopes, fixtures, and appliances under the stretch code straw proposal. The Home Energy Rating System (HERS) and Thermal Energy Demand Intensity (TEDI) standards are important measures to drive these efficiency improvements.

Thank you for your consideration. You may contact me with any questions at ben@environmentmassachusetts.org or 914-420-9706.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Hellerstein', with a stylized flourish at the end.

Ben Hellerstein
State Director
Environment Massachusetts