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

March 16, 2022

Attention Nina Mascarenhas: Stretch Code Straw Proposal Comments

Dear Ms. Mascarenhas,

Berkshire Environmental Action Team (BEAT) and No Fracked Gas in Mass (NFGiM) respectfully submit the following comments regarding MA Department of Energy Resources' Building Energy Code Straw Proposal: Updated Stretch Code & Specialized Opt-In Code, dated February 2022.

The straw proposal's Specialized Opt-In Code lacks a generally accepted definition of a net-zero energy building. Along with minimum efficiency requirements, the code should require zero emissions and stipulate that all energy required over the course of a year must either be generated on site, or obtained from nearby renewable generation. The concept of "nearby" is somewhat vague, but at minimum should be restricted to energy that qualifies for Massachusetts Class I renewable energy credits.

Because a net-zero energy building by definition seeks to produce at least as much renewable energy on site as it consumes during a one-year period, the Specialized Opt-In Code must require PV solar deployment whenever possible. The straw proposal is wrong to omit a PV solar requirement for all-electric construction.

We appreciate that the proposed Specialized Opt-In Code attempts to create an economic preference for electrification in new buildings. However, for Massachusetts to meet its emissions reduction requirements, residential and commercial buildings must fully electrify at a rapid pace. Local gas distribution companies (LDCs) also need certainty regarding the permanent reduction of natural gas demand in various parts of their distribution networks. The move to zero-emitting buildings should therefore be a matter of policy, with no fossil fuel option, and full electrification required for all new construction and major renovations. Replacement of individual appliances, including furnace/boiler, clothes dryer, water heater, and cook stove, should also require a switch to an electric alternative. The objective should be to create a ratchet effect where demand for natural gas in the building sector has no option but to decrease.

Both the Updated Stretch Code & Specialized Opt-In Code should also address building retrofit projects smaller than “major renovations”. Language should cover projects including the replacement of roofs, windows, or siding, to ensure that these projects improve the building envelope sufficiently to allow future full building electrification without need for further improvement of the project just completed. This is particularly important for environmental justice communities, where many buildings are rental properties and new construction is relatively rare. Setting minimum energy efficiency standards, along with requirements for meaningful improvements during renovations, coupled with building electrification policies, will improve the health, safety, and comfort of building occupants. Policies must be designed in such a way that cause a reduction in tenant utility bills as a result of these renovations.

Embodied carbon is a significant source of greenhouse gas emissions for the building sector, and therefore must be addressed in the stretch codes. The Updated Stretch Code & Specialized Opt-In Code should both establish a catalog of preferred materials, a GHG intensity rating system, and incentives to encourage their use. The state should provide a clear set of guidelines regarding the practicalities and economics associated with the specification, selection, and use of these materials.

Finally, the Mass Clean Energy Center has developed and piloted a number of excellent programs, including the [Triple Decker Retrofit](#) program and [Decarbonization Pathways](#). These and other programs, Mass Save incentives, and both stretch codes should all work together toward achieving a minimum 50% reduction in building-sector emissions by 2030.

Respectfully,



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