



March 18, 2022

Ms. Nina Mascarenhas
Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

RE: Stretch Energy Building Code Straw proposal
Via email: stretchcode@mass.gov

Dear Ms. Mascarenhas:

The Massachusetts Coalition for Sustainable Energy (MCSE) thanks you for the opportunity to comment on the draft stretch energy building code straw proposal.

With 22 members including some of the Commonwealth's leading and most important business, employer, organized labor and trade groups and regional chambers of commerce, our coalition represents many of the workers, developers, suppliers and contractors who build homes and commercial structures and bring them to market. As such, we have a strong interest in ensuring this process generates genuine and thoughtful tools for the building sector to methodically reduce its emissions footprint. While we expect to further comment on this process as it moves forward, currently we want to share three observations.

First, as this rulemaking process advances, we do wish to stress our strong opposition to any proposal that would prohibit the use of or connection of infrastructure that currently supplies natural gas utility service. While we recognize the importance of moving more assertively to more renewable sources, we believe decommissioning this tool would be costly – both in dollar terms but also to our ability to eliminate the use of dirty fuels such as oil-based propane. To that end, we are pleased to see no such restriction in the straw proposal.

Secondly, we strongly urge the Department to allow projects to proceed under existing building rules for a period of one year concurrent with the force and effect of the new stretch energy code rules. While we are optimistic about the final result of this process, we remain concerned about the unintended consequences this new code could have in potentially halting new construction investment across the Commonwealth. This would result in decreasing housing construction and commercial inventory, raising mortgage and rent costs for everyone and

slowing economic growth. It is in no one's interests for projects that are currently in the planning and design process to either pause or not move forward because of concerns that vertical construction rules might change.

Finally, we are highly concerned by the view expressed or implied that the only route to decarbonizing the building sector is via electrification. This is false. Building in the Commonwealth is challenging and costly enough, with energy costs in New England, especially for electricity, the single highest in the nation. This is a reality that the development of this code must confront, not exacerbate, by choosing, as some have suggested, to eliminate the utilization new and decarbonized sources of energy. While they are not yet online, technologies such as hydrogen and renewable natural gas are potential important tools, and consumer options, to utilize existing pipeline infrastructure while sustainably and affordably reducing emissions.

Thank you for your consideration of our comments and those we will offer going forward. We appreciate all of the thoughtful work that you are doing to develop a workable and groundbreaking new stretch energy code that puts us on a clear, but responsible path to net zero.

Sincerely,



