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

March 15, 2022

**Re: Specialized Stretch Code Straw Proposal Comments**

Dear Commissioner Woodcock, Secretary Theoharides, and Secretary Kennealy,

The DOER has the opportunity to respond meaningfully to the latest IPCC report calling for nothing less than bold action to avert the most devastating impacts of climate disruption. Though the proposed new Specialized Stretch Code presents a step in the right direction, it fails to meet the need of this historic moment, in which incremental change is insufficient.

The draft Specialized Stretch Code that DOER presented for public review on February 8th, does not adhere to the mandate in the Next Generation Roadmap bill signed into law a year ago, and therefore will not help us achieve the goals we have set for GHG emissions reduction.

It is necessary for DOER to strengthen this draft code in several ways. The revised Specialized Stretch Code should:

1. Use a definition of net-zero that is widely accepted by building professionals.
2. Apply to both new construction as well as substantial renovations.
3. Not allow the combustion of fossil fuels to supply power to new buildings nor those substantially renovated.
4. Require on or off-site renewable energy to supply the electricity for efficient all-electric heating and cooking appliances, rather than waiting for the grid's electricity to be supplied entirely by clean, renewable energy.
5. Require low embodied carbon building materials including lower-GHG emitting refrigerants.
6. Allow Green Communities 3 years to adopt the net zero stretch code.
7. Allow only Green Communities who adopt the net zero stretch code to be eligible to apply for the grant funds available to Green Communities.
8. Be effective as of January 2023.
9. Require all new buildings to install heat or energy recovery ventilation to maintain healthful air quality.

Thank you for considering these improvements to the draft Specialized Stretch Code in future iterations. These changes will assure that we are capable of achieving the GHG reduction goals established by the Commonwealth of Massachusetts.

Sincerely,

*Adele Franks*

On behalf of the Steering Committee, Climate Action Now, Western Mass (CAN)