

## Finlayson, Ian (ENE)

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**From:** Russell Freeman <Russell.Freeman.565010670@p2a.co>  
**Sent:** Thursday, 11 August 2022 8:21 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

Notably, prioritizing electricity over propane increases emissions today, and will continue to increase emissions in the future as renewable propane blends increase their market share and power more efficient equipment. And today, high efficiency propane appliances can produce net zero buildings, which negates the need for a building to be fully pre-wired for future electrification. This requirement would only serve to increase housing costs – when housing costs are already at record highs – and unfairly promote one energy source over another. This should not be the goal of stretch energy codes.

Building electrification, as proposed, would not produce the greenhouse gas (GHG) emission reductions envisioned. The carbon intensity of utility-scale electricity in Massachusetts is 139.1, compared to 80.1 for conventional propane and as low as 21 for renewable propane. Fossil fuels have been and will, for the foreseeable future, be a primary source of power generation in the Bay State, especially when energy costs and reliability are taken into account. This further undermines assumptions about the carbon intensity of electricity.

A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

Further, it is important to note that high efficiency, "cold climate" heat pumps have approximately the same carbon footprint as high efficiency propane heating systems during the heating season when the analysis takes into consideration the use of supplemental electric resistance back up heating, which is needed to provided sufficient warmth to buildings during cold spells. This is more evidence of the inherent inefficiencies associated with grid electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Russell Freeman  
2 International Way  
Lawrence, MA 01843

## Finlayson, Ian (ENE)

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**From:** Darren Germain <Darren.Germain.535979912@p2a.co>  
**Sent:** Thursday, 11 August 2022 5:27 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

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Thank you for the consideration of my request.

Regards,  
Darren Germain  
176 Farm St  
Blackstone, MA 01504

## Finlayson, Ian (ENE)

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**From:** Michael Maravelias <Michael.Maravelias.564856231@p2a.co>  
**Sent:** Tuesday, 9 August 2022 8:19 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

As a propane equipment provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

Deep electrification will increase emissions and the need for more power plants. The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

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Thank you for the consideration of my request.

Regards,  
Michael Maravelias  
188 Fairview Ln  
Plymouth, MA 02360

## Finlayson, Ian (ENE)

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**From:** David Kjellman <David.Kjellman.564855755@p2a.co>  
**Sent:** Tuesday, 9 August 2022 8:02 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

As an employee of a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
David Kjellman  
1 Crest Dr  
Lakeville, MA 02347



## Finlayson, Ian (ENE)

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**From:** Thomas Pecoraro <Thomas.Pecoraro.564854260@p2a.co>  
**Sent:** Tuesday, 9 August 2022 6:46 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Thomas Pecoraro  
211 West St  
Quincy, MA 02169

## Finlayson, Ian (ENE)

---

**From:** Scott Dunn <Scott.Dunn.536224107@p2a.co>  
**Sent:** Monday, 8 August 2022 9:34 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Scott Dunn  
241 Lancaster Dr  
Agawam, MA 01001

## Finlayson, Ian (ENE)

---

**From:** Mark Brideau <Mark.Brideau.564627488@p2a.co>  
**Sent:** Monday, 8 August 2022 1:32 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As an Oil and propane provider serving the energy needs of Central Massachusetts, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Mark Brideau  
49 Cobbler Dr  
Fitchburg, MA 01420

## Finlayson, Ian (ENE)

---

**From:** DARRYL COREY <DARRYL.COREY.535926956@p2a.co>  
**Sent:** Monday, 8 August 2022 1:11 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
DARRYL COREY  
160 Middlesex Tpke  
Bedford, MA 01730



## Finlayson, Ian (ENE)

---

**From:** David Darrah <David.Darrah.512404284@p2a.co>  
**Sent:** Monday, 8 August 2022 12:45 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

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Thank you for the consideration of my request.

Regards,  
David Darrah  
216 Lockhouse Rd  
Westfield, MA 01085

## Finlayson, Ian (ENE)

---

**From:** Eric Wyson <Eric.Wyson.564230749@p2a.co>  
**Sent:** Monday, 8 August 2022 11:43 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Eric Wyson  
316 Knower Rd  
Westminster, MA 01473

## Finlayson, Ian (ENE)

---

**From:** Troy Bryce <Troy.Bryce.564220254@p2a.co>  
**Sent:** Monday, 8 August 2022 7:45 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

Notably, prioritizing electricity over propane increases emissions today, and will continue to increase emissions in the future as renewable propane blends increase their market share and power more efficient equipment. And today, high efficiency propane appliances can produce net zero buildings, which negates the need for a building to be fully pre-wired for future electrification. This requirement would only serve to increase housing costs – when housing costs are already at record highs – and unfairly promote one energy source over another. This should not be the goal of stretch energy codes.

Building electrification, as proposed, would not produce the greenhouse gas (GHG) emission reductions envisioned. The carbon intensity of utility-scale electricity in Massachusetts is 139.1, compared to 80.1 for conventional propane and as low as 21 for renewable propane. Fossil fuels have been and will, for the foreseeable future, be a primary source of power generation in the Bay State, especially when energy costs and reliability are taken into account. This further undermines assumptions about the carbon intensity of electricity.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Troy Bryce  
27 Tynan Ave  
Taunton, MA 02718

## Finlayson, Ian (ENE)

---

**From:** Michael pluta <Michael.pluta.564218653@p2a.co>  
**Sent:** Monday, 8 August 2022 6:30 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Michael pluta  
18 West St  
Paxton, MA 01612



## Finlayson, Ian (ENE)

---

**From:** Michelle Plissey <Michelle.Plissey.564137347@p2a.co>  
**Sent:** Saturday, 6 August 2022 10:00 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Michelle Plissey  
2 Homestead Way  
Freetown, MA 02717

## Finlayson, Ian (ENE)

---

**From:** Dana Bettinson <Dana.Bettinson.564048931@p2a.co>  
**Sent:** Friday, 5 August 2022 1:00 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Dana Bettinson  
80 County Rd  
Freetown, MA 02717

## Finlayson, Ian (ENE)

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**From:** Peter DeFreitas <Peter.DeFreitas.564045916@p2a.co>  
**Sent:** Friday, 5 August 2022 12:10 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a Plumbing Gas Fitting professional serving the comfort, health, and safety needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Peter DeFreitas  
6 Nashoba Ln  
Yarmouth, MA 02675

## Finlayson, Ian (ENE)

---

**From:** Douglas Plissey <Douglas.Plissey.564044250@p2a.co>  
**Sent:** Friday, 5 August 2022 11:45 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

We are a 4th generation, small - family owned propane provider serving the energy needs of our friends, family and neighbors in South Eastern MA. I am communicating with you my (our) disappointment with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Douglas Plissey  
80 County Rd  
Freetown, MA 02717



## Finlayson, Ian (ENE)

---

**From:** Jonathan Allen <Jonathan.Allen.535978265@p2a.co>  
**Sent:** Friday, 5 August 2022 7:29 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Jonathan Allen  
35 Chestnut St  
North Attleborough, MA 02760

## Finlayson, Ian (ENE)

---

**From:** Nancy Johnson <Nancy.Johnson.564009123@p2a.co>  
**Sent:** Thursday, 4 August 2022 6:45 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Nancy Johnson  
1541 Wellington St  
Dighton, MA 02715

## Finlayson, Ian (ENE)

---

**From:** John Finn <John.Finn.564007369@p2a.co>  
**Sent:** Thursday, 4 August 2022 6:12 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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Thank you for the consideration of my request.

Regards,  
John Finn  
84 Newbury St  
Peabody, MA 01960

## Finlayson, Ian (ENE)

---

**From:** Raymond Murray <Raymond.Murray.518319300@p2a.co>  
**Sent:** Thursday, 4 August 2022 5:29 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Building electrification, as proposed, would not produce the greenhouse gas (GHG) emission reductions envisioned. The carbon intensity of utility-scale electricity in Massachusetts is 139.1, compared to 80.1 for conventional propane and as low as 21 for renewable propane. Fossil fuels have been and will, for the foreseeable future, be a primary source of power generation in the Bay State, especially when energy costs and reliability are taken into account. This further undermines assumptions about the carbon intensity of electricity.

A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

Further, it is important to note that high efficiency, "cold climate" heat pumps have approximately the same carbon footprint as high efficiency propane heating systems during the heating season when the analysis takes into consideration the use of supplemental electric resistance back up heating, which is needed to provided sufficient warmth to buildings during cold spells. This is more evidence of the inherent inefficiencies associated with grid electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Raymond Murray  
14 Hemlock Hill Rd  
Great Barrington, MA 01230



## Finlayson, Ian (ENE)

---

**From:** Matthew Wilkinson <Matthew.Wilkinson.535937639@p2a.co>  
**Sent:** Thursday, 4 August 2022 4:40 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a manager of Wilkinson Fuels, a propane company serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Matthew Wilkinson  
329 Wilbur Ave  
Somerset, MA 02725

## Finlayson, Ian (ENE)

---

**From:** ANGELA PEREZ <ANGELA.PEREZ.564000276@p2a.co>  
**Sent:** Thursday, 4 August 2022 4:34 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
ANGELA PEREZ  
237 Locust St  
Holyoke, MA 01040

## Finlayson, Ian (ENE)

---

**From:** Dan Malazzi <Dan.Malazzi.535933994@p2a.co>  
**Sent:** Thursday, 4 August 2022 3:16 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Dan Malazzi  
234 Burlington Ave  
Wilmington, MA 01887

## Finlayson, Ian (ENE)

---

**From:** Debbie Eckert <Debbie.Eckert.563994464@p2a.co>  
**Sent:** Thursday, 4 August 2022 3:14 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Debbie Eckert  
32 Voss Ave  
Chicopee, MA 01020



## Finlayson, Ian (ENE)

---

**From:** Jennifer Bennett <Jennifer.Bennett.563993942@p2a.co>  
**Sent:** Thursday, 4 August 2022 3:07 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Jennifer Bennett  
95 Richview Ave  
South Hadley, MA 01075

## Finlayson, Ian (ENE)

---

**From:** Justin Devaney <Justin.Devaney.535925588@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:52 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Justin Devaney  
177 Wells Ave  
Newton, MA 02459

## Finlayson, Ian (ENE)

---

**From:** Timothy Mahoney <Timothy.Mahoney.563991845@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:43 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Timothy Mahoney  
95 Main St  
South Hadley, MA 01075

## Finlayson, Ian (ENE)

---

**From:** Nicholas Johnson <Nicholas.Johnson.535931978@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:42 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a 3rd Generation Propane Professional, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code. I do not feel that this is the most sustainable solution to a carbon neutral future.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of our environment and competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. I'm not sure how that makes any sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

Notably, prioritizing electricity over propane INCREASES EMISSIONS TODAY, and will continue to increase emissions in the future as renewable propane blends increase their market share and power more efficient equipment. And today, high efficiency propane appliances can produce net zero buildings, which negates the need for a building to be fully pre-wired for future electrification. This requirement would only serve to increase housing costs – when housing costs are already at record highs – and unfairly promote one energy source over another. This should not be the goal of stretch energy codes.

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Further, it is important to note that high efficiency, "cold climate" heat pumps have approximately the same carbon footprint as high efficiency propane heating systems during the heating season when the analysis takes into consideration the use of supplemental electric resistance back up heating, which is needed to provided sufficient warmth to buildings during cold spells. Reliability of heat can be a life or death situation in New England. Power outages

plague Southeastern Massachusetts during the most severe weather. These weather events would put people out of heat, hot water and cooking abilities. Propane equipment is much more dependable in these weather events and can be stored for the long haul. Did we learn anything from Texas??? This is more evidence of the inherent inefficiencies and dangers associated with grid electricity dependence.

I believe it is my responsibility to stand up for my consumers, employees and family by opposing this code. I want to see a clean environment and know that propane is part of that solution not the enemy. A sustainable energy source is ECONOMICAL FOR ALL, ACCOMODATES ALL LIFESTYLES AND IS ENVIRONMENTALLY FRIENDLY. Sustainability means balancing social, economic and environmental goals. Balance is the key word. Without balance our society will fall suffer. Propane already helps meet all of these goals and will continue to do so even better as renewable propane is brought to scale. Gas bans will adversely affect low income and rural communities. Some of the very communities our business serves.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources and communities.

Thank you for the consideration and God Bless.

Regards,  
Nicholas Johnson  
2 Old Anawan Rd  
Rehoboth, MA 02769



## Finlayson, Ian (ENE)

---

**From:** Christopher Chase <Christopher.Chase.563991142@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:33 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Further, it is important to note that high efficiency, "cold climate" heat pumps have approximately the same carbon footprint as high efficiency propane heating systems during the heating season when the analysis takes into consideration the use of supplemental electric resistance back up heating, which is needed to provided sufficient warmth to buildings during cold spells. This is more evidence of the inherent inefficiencies associated with grid electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Christopher Chase  
470 Southampton Rd  
Westfield, MA 01085

## Finlayson, Ian (ENE)

---

**From:** Michael George <Michael.George.563990350@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:21 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

Notably, prioritizing electricity over propane increases emissions today, and will continue to increase emissions in the future as renewable propane blends increase their market share and power more efficient equipment. And today, high efficiency propane appliances can produce net zero buildings, which negates the need for a building to be fully pre-wired for future electrification. This requirement would only serve to increase housing costs – when housing costs are already at record highs – and unfairly promote one energy source over another. This should not be the goal of stretch energy codes.

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Thank you for the consideration of my request.

Regards,  
Michael George  
3 Berkshire Trl W  
Goshen, MA 01032

## Finlayson, Ian (ENE)

---

**From:** Barbara Morrisette <Barbara.Morrisette.563989280@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:05 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,  
Barbara Morrisette  
42 Montauk Rd  
Chicopee, MA 01013

## Finlayson, Ian (ENE)

---

**From:** CHERYL DRISCOLL <CHERYL.DRISCOLL.563989244@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:05 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

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Thank you for the consideration of my request.

Regards,  
CHERYL DRISCOLL  
5 Ralph Ave  
South Hadley, MA 01075



## Finlayson, Ian (ENE)

---

**From:** PAMELA SPRING-LUKOMSKI <PAMELA.SPRINGLUKOMSKI.563989064@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:03 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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Thank you for the consideration of my request.

Regards,  
PAMELA SPRING-LUKOMSKI  
136 Montcalm St  
Chicopee, MA 01020

## Finlayson, Ian (ENE)

---

**From:** NATHAN COLLINS <NATHAN.COLLINS.563988939@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:01 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

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Thank you for the consideration of my request.

Regards,  
NATHAN COLLINS  
67 Walker Rd  
Wales, MA 01081

## Finlayson, Ian (ENE)

---

**From:** Joseph Trefethen <Joseph.Trefethen.518320777@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:01 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

Pioneer Oil & Propane serves the energy needs of Bay Staters. I am writing today to express my disappointment with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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electricity.

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Thank you for the consideration of my request.

Regards,  
Joseph Trefethen  
59 Technology Park Rd  
Sturbridge, MA 01566

## Finlayson, Ian (ENE)

---

**From:** Cindy Barcomb <Cindy.Barcomb.563988876@p2a.co>  
**Sent:** Thursday, 4 August 2022 2:01 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Cindy Barcomb  
13 Chestnut St  
Hatfield, MA 01038



## Finlayson, Ian (ENE)

---

**From:** Stephan Chase <Stephan.Chase.519414772@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:57 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

Good Afternoon,

I am perplexed as to what you all are thinking!!!

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Stephan Chase  
95 Main St  
South Hadley, MA 01075

## Finlayson, Ian (ENE)

---

**From:** Scott Swensen <Scott.Swensen.563988056@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:51 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

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The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Scott Swensen  
29 Edgewater Ln  
Taunton, MA 02780

## Finlayson, Ian (ENE)

---

**From:** Brandon Baldyga <Brandon.Baldyga.563986120@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:28 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider with the company Dileo Gas Inc, serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

Notably, prioritizing electricity over propane increases emissions today, and will continue to increase emissions in the future as renewable propane blends increase their market share and power more efficient equipment. And today, high efficiency propane appliances can produce net zero buildings, which negates the need for a building to be fully pre-wired for future electrification. This requirement would only serve to increase housing costs – when housing costs are already at record highs – and unfairly promote one energy source over another. This should not be the goal of stretch energy codes.

Building electrification, as proposed, would not produce the greenhouse gas (GHG) emission reductions envisioned. The carbon intensity of utility-scale electricity in Massachusetts is 139.1, compared to 80.1 for conventional propane and as low as 21 for renewable propane. Fossil fuels have been and will, for the foreseeable future, be a primary source of power generation in the Bay State, especially when energy costs and reliability are taken into account. This further undermines assumptions about the carbon intensity of electricity.

A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

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electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Brandon Baldyga  
630 Sunderland Rd  
Worcester, MA 01604

## Finlayson, Ian (ENE)

---

**From:** Thomas vangel <Thomas.vangel.563986003@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:26 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Thomas vangel  
37 Vine Rd  
Charlton, MA 01507



## Finlayson, Ian (ENE)

---

**From:** Timothy Laramée <Timothy.Laramée.563985897@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:25 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,  
Timothy Laramée  
100 N Main St  
Grafton, MA 01536

## Finlayson, Ian (ENE)

---

**From:** Carl Kaplan <Carl.Kaplan.548421844@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:16 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a business related to propane providers serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

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Thank you for the consideration of my request.

Regards,  
Carl Kaplan  
150 Royall St  
Canton, MA 02021

## Finlayson, Ian (ENE)

---

**From:** Harry DiLeo <Harry.DiLeo.536159443@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:16 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,  
Harry DiLeo  
83 Phillips St  
Boston, MA 02114

## Finlayson, Ian (ENE)

---

**From:** John Macedonio <John.Macedonio.535937918@p2a.co>  
**Sent:** Thursday, 4 August 2022 1:02 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,  
John Macedonio  
20 Anawan St  
Somerset, MA 02725



## Finlayson, Ian (ENE)

---

**From:** Thomas Labrecque <Thomas.Labrecque.535928927@p2a.co>  
**Sent:** Thursday, 4 August 2022 12:35 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

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Thank you for the consideration of my request.

Regards,  
Thomas Labrecque  
84 Newbury St  
Peabody, MA 01960

## Finlayson, Ian (ENE)

---

**From:** Luanne LaPorte <Luanne.LaPorte.563979966@p2a.co>  
**Sent:** Thursday, 4 August 2022 12:35 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Dear Massachusetts DOER,

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Thank you for the consideration of my request.

Regards,  
Luanne LaPorte  
French St  
Rehoboth, MA 02769

## Finlayson, Ian (ENE)

---

**From:** Rebecca Blythe <Rebecca.Blythe.563979731@p2a.co>  
**Sent:** Thursday, 4 August 2022 12:34 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,  
Rebecca Blythe  
Seekonk Ma  
Seekonk, MA 02771

## Finlayson, Ian (ENE)

---

**From:** Matt Talbot <Matt.Talbot.535929854@p2a.co>  
**Sent:** Thursday, 4 August 2022 12:34 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Thank you for the consideration of my request.

Regards,  
Matt Talbot  
846 Middle St  
Dighton, MA 02764



## Finlayson, Ian (ENE)

---

**From:** Emily Brightman <Emily.Brightman.535929854@p2a.co>  
**Sent:** Thursday, 4 August 2022 12:33 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments from Mass Propane Marketers

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts DOER,

As a propane provider serving the energy needs of Bay Staters, I am disappointed with the Massachusetts Department of Energy Resources' (DOER) draft code language for the stretch energy code and specialized municipal opt-in code.

The current proposal makes unfair efficiency exceptions for electricity, to the detriment of competing clean energy sources, like propane. The proposed code requirements impose an inequitable minimum HERS rating on buildings depending on their energy source. Mixed fuel buildings would have to achieve a lower HERS score than all-electric, unfairly increasing costs while allowing electric buildings to be less efficient. This makes no sense. The HERS energy rating requirement should be equal for both electric and mixed fuel buildings. Energy codes should not prioritize one clean energy source over another.

Notably, prioritizing electricity over propane increases emissions today, and will continue to increase emissions in the future as renewable propane blends increase their market share and power more efficient equipment. And today, high efficiency propane appliances can produce net zero buildings, which negates the need for a building to be fully pre-wired for future electrification. This requirement would only serve to increase housing costs – when housing costs are already at record highs – and unfairly promote one energy source over another. This should not be the goal of stretch energy codes.

Building electrification, as proposed, would not produce the greenhouse gas (GHG) emission reductions envisioned. The carbon intensity of utility-scale electricity in Massachusetts is 139.1, compared to 80.1 for conventional propane and as low as 21 for renewable propane. Fossil fuels have been and will, for the foreseeable future, be a primary source of power generation in the Bay State, especially when energy costs and reliability are taken into account. This further undermines assumptions about the carbon intensity of electricity.

A principal driver of DOER's energy code update is to reduce GHG emissions to combat climate change – goals I support. However, in order to do that, the agency must accurately calculate emissions from various sources. Propane is a primary energy source and electricity is a secondary energy source. The only way to fairly and completely compare the emissions from these different sources is to utilize a full fuel-cycle energy analysis, based on source energy metrics. This accounts for applicable efficiencies and emissions related the production and delivery of energy. As such, I strongly recommend that DOER include the R405.2 exception in its base energy code and update the source energy conversions and emissions factors relevant to Massachusetts.

Further, it is important to note that high efficiency, "cold climate" heat pumps have approximately the same carbon footprint as high efficiency propane heating systems during the heating season when the analysis takes into consideration the use of supplemental electric resistance back up heating, which is needed to provided sufficient warmth to buildings during cold spells. This is more evidence of the inherent inefficiencies associated with grid electricity.

There is economic, resilience and decarbonization value in energy diversity. These should be core pillars of any update to energy codes. I strongly urge DOER to consider my input and amend its proposal to ensure it is fair to all energy sources.

Thank you for the consideration of my request.

Regards,  
Emily Brightman  
846 Middle St  
Dighton, MA 02764

## Finlayson, Ian (ENE)

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**From:** Tim Johnson <Tim.Johnson.535929782@p2a.co>  
**Sent:** Thursday, 4 August 2022 12:30 PM  
**To:** STRETCHCODE (ENE)  
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Europe is now in a bind due to these measure and reliance on renewable. We need an all of the above sollution

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Regards,  
Tim Johnson  
177 Winthrop St  
Rehoboth, MA 02769