

Finlayson, Ian (ENE)

From: Leslie Anderson <Leslie.Anderson.535924246@p2a.co>
Sent: Thursday, 4 August 2022 12:21 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

Follow Up Flag: Follow up
Flag Status: Flagged

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 head of the Propane Gas Association of New England, representing propane marketers across the state who are 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,
Leslie Anderson
1074 Suncook Valley Hwy S
Epsom, NH 03234

Finlayson, Ian (ENE)

From: Stacey McCormick <Stacey.McCormick.563982304@p2a.co>
Sent: Thursday, 4 August 2022 12:58 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Stacey McCormick
1 Simons Ln
Newmarket, NH 03857

Finlayson, Ian (ENE)

From: Lex Johnson <Lex.Johnson.535925227@p2a.co>
Sent: Thursday, 4 August 2022 1:06 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Lex Johnson
6 Armstrong Rd
Shelton, CT 06484

Finlayson, Ian (ENE)

From: Lindsey Stansfield <Lindsey.Stansfield.519625813@p2a.co>
Sent: Thursday, 4 August 2022 2:54 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Lindsey Stansfield
800 Westchester Ave
Rye Brook, NY 10573

Finlayson, Ian (ENE)

From: Daniel Ochs <Daniel.Ochs.563996354@p2a.co>
Sent: Thursday, 4 August 2022 3:38 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Daniel Ochs
52 Weeks St
North Smithfield, RI 02896

Finlayson, Ian (ENE)

From: Steven Castle <Steven.Castle.563996381@p2a.co>
Sent: Thursday, 4 August 2022 3:39 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Steven Castle
42 Shirking Rd
Fremont, NH 03044

Finlayson, Ian (ENE)

From: Maribeth Girard <Maribeth.Girard.563997245@p2a.co>
Sent: Thursday, 4 August 2022 3:52 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Regards,
Maribeth Girard
1 Simons Ln
Newmarket, NH 03857

Finlayson, Ian (ENE)

From: Timothy Condon <Timothy.Condon.519416338@p2a.co>
Sent: Friday, 5 August 2022 9:26 AM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Regards,
Timothy Condon
PO Box 1800
Rochester, NH 03866

Finlayson, Ian (ENE)

From: Whitney Cloutier <Whitney.Cloutier.520310829@p2a.co>
Sent: Friday, 5 August 2022 9:29 AM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Regards,
Whitney Cloutier
28 Industrial Way
Rochester, NH 03867

Finlayson, Ian (ENE)

From: Mark Berry <Mark.Berry.548409172@p2a.co>
Sent: Friday, 5 August 2022 11:36 AM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Sent: Monday, 8 August 2022 9:47 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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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,
James Martin
37 Lawson Farm Rd
Londonderry, NH 03053

Finlayson, Ian (ENE)

From: Josh Anderson <Josh.Anderson.564225132@p2a.co>
Sent: Monday, 8 August 2022 9:58 AM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Josh Anderson
44 Trask Mountain Rd
Wolfeboro, NH 03894

Finlayson, Ian (ENE)

From: David Herr <David.Herr.564568367@p2a.co>
Sent: Monday, 8 August 2022 12:41 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Regards,
David Herr
4623 Pin Oak Ln
Bellaire, TX 77401

Finlayson, Ian (ENE)

From: Steven januario <Steven.januario.535985591@p2a.co>
Sent: Monday, 8 August 2022 1:32 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Steven Januario
10 Jessica Dr
Bristol, RI 02809

Finlayson, Ian (ENE)

From: Steven januario <Steven.januario.535985591@p2a.co>
Sent: Monday, 8 August 2022 1:34 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Regards,
Steven Januario
10 Jessica Dr
Bristol, RI 02809

Finlayson, Ian (ENE)

From: Bailey McQueary <Bailey.McQueary.564834703@p2a.co>
Sent: Monday, 8 August 2022 5:44 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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Thank you for the consideration of my request.

Regards,
Bailey McQueary
798 Havenwood Dr
Lincoln, CA 95648

Finlayson, Ian (ENE)

From: Christopher Wagner <Christopher.Wagner.520408209@p2a.co>
Sent: Friday, 12 August 2022 8:19 PM
To: STRETCHCODE (ENE)
Subject: Comments from Mass Propane Marketers

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The propane industry continues to move to renewable solutions at a rate faster than the electric industries efforts to decarbonize the electrical source energy. Our data shows that through new advances in Renewable Propane development and additives such as Renewable Dimethyl Ether (DME) that LP gas is on a path to zero at a rate much faster than other energy sources, including electricity.

AmeriGas, through our Parent Company UGI Corporation, is firmly committed to being a valued part of a greener tomorrow through significant capital investments in the renewables market and believes that these efforts should be

considered by this body in the development of reliable, secure, multisource, and green energy solution for the citizens of the Commonwealth both during normal operation as well as during those of an emergent nature.

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Thank you for the consideration of my request.

Regards,
Christopher Wagner
460 N Gulph Rd
King Of Prussia, PA 19406