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Sent: Friday, 4 March 2022 10:15 AM
To: STRETCHCODE (ENE)
Subject: Comments on Building Energy Code Straw Proposal

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Thank you for this opportunity to comment on the Building Energy Code Straw Proposal

1. The Updated Stretch Code and the Specialized Opt-In Code should apply to major renovations as well as new construction.
2. Considering the Commonwealth's goal of cutting greenhouse gas emissions by 50% by 2030, less than eight years from today, the Specialized Opt-In Code must allow for all-electric new construction/major renovation for communities that wish to opt in. As you know, there are many towns/cities in Massachusetts that are ready to adopt all-electric new construction/major renovation. Please let those who are willing to take this step do so now.
3. The Climate Act of 2021 requires DOER to define "net-zero building." In Slide 23 net zero building is defined as *"Net-Zero new construction is compatible, as-built, with the Commonwealth's net-zero emissions economy in 2050."* This is not a definition of net-zero building. I don't know what the sentence means. Can you define what "net-zero emissions economy" is. If you are going to use it as a standard, then you must provide a quantitative metric to determine if a particular building is compatible with the net-zero emissions economy?
4. DOER needs to explain how a fossil fuel heated home with fossil fuel water heating, cooking and clothes drying and without rooftop solar, due to shading, is "compatible, as-built, with the Commonwealth's net-zero emissions economy in 2050."
5. New buildings that cannot offset at least 75% of their annual energy load with on-site, non-emissions producing energy must be all-electric.
6. DOER should Incentivize solar roofs on all-electric buildings.
7. The Stretch Code and Specialized Opt-In Code should require 10% of multi-vehicle parking facility spaces have electric vehicle service equipment (EVSE). All other spaces in the parking facilities should be constructed with conduits in place to allow for additional EVSE wiring in the future. The cost of including the conduits is minimal while the cost saving down the road are significant.

Roger Wrubel
Town of Belmont Energy Committee
Belmont Town Meeting Member