

## Finlayson, Ian (ENE)

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**From:** Kareem Roustom <kareem.roustom@gmail.com>  
**Sent:** Sunday, 24 July 2022 4:40 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** BUILDING CODE COMMENTS

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TO: Department of Energy Resources

I am deeply disappointed that the DOER's proposal of a new "net zero" stretch energy code continues to deny cities and towns the ability to ban natural gas in new construction. As such, I would like DOER to enact a stretch code that allows cities and towns to require a fossil-fuel-free pathway to building code compliance. Currently, DOER's specialized "net zero" code allows new construction of all types to install new fossil fuel infrastructure. This is wrong and catastrophically counterproductive at a time of climate crisis.

Buildings account for 27% of overall GHG emissions and in 2020, only 461 homes in Massachusetts switched heating fuel from gas, oil, or propane to electric heat pumps. In order to meet 2025 and 2030 limits, the Baker administration is relying on steep reductions in a sector that has shown itself to be static over the last 30+ years.

The legally-binding goals set by the Legislature require the state to achieve net-zero emissions statewide by 2050. This means emissions from all sectors, including heating and cooling residential and commercial buildings, need to be drastically reduced, and reach net zero. This is why banning fossil fuels from new construction *and* retro-fitting older buildings is vital. Building certain buildings with heat pumps and electric-only appliances adds negligible cost to construction, and will save homebuyers and homeowners money right away on utility bills. Electrical pre-wiring does not go far enough.

This is why I am asking the DOER to allow cities and towns who adopt the specialized net zero energy code to require fossil-fuel-free paths to code compliance for new buildings. Specifically, I am asking the DOER to allow towns adopting the specialized net zero stretch code to be able to require compliance using the all-electric "pathway". By 'all-electric' I am asking that a building must meet minimum efficiency standards and use heat pumps for primary space heating, and heat pumps or solar thermal water heating, and all-electric appliances.

Sincerely,  
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