

Lisa Cunningham, Brookline, MA

Massachusetts Department of Energy Resources
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Dear Commissioner Woodcock, Secretary Kennealy & Secretary Card:

I would like to submit the testimony I gave on August 8, 2022.

My name is Lisa Cunningham, I am a co-founder of [ZeroCarbonMA](#), as well as a co-founder of a statewide building electrification coalition now comprising over 30 municipalities throughout Massachusetts. I am also an architect whose practice is now focused on decarbonizing homes, and I am one of the co-petitioners for Brookline's prohibition on the installation of new fossil fuel infrastructure in new buildings and major construction.

I just returned from two weeks in central Maine when I was working but outside frequently. Since I returned on Friday, I have not been able to go outside of my home during the day. I am one of the lucky ones. There are trees in my neighborhood - not just pavement – and some of these are DYING trees. Because in addition to unprecedented heat, we also have an unprecedented drought. My house, although old, has been insulated through MassSave programs over the years. And best of all - we installed heat pumps in our home almost two years ago, and since then we have had deliciously conditioned air – cool and pleasant – all summer long. And our winter heat has improved, as well – instead of radiators that go from too hot to too cold, we also have even and comfortable heat in the winter.

I want to thank DOER for their efforts to date, and I also want to commend my colleagues for their work and engagement with DOER, including the comments today – but there is plenty of room for improvement. I want to focus on a few points:

First of all Electrification. We know that in order to avoid catastrophic climate failure we need to stop using fossil fuels - including gas, oil and propane - immediately. We've been told by the United Nations International Panel on Climate Change, last year and this year, with increasingly dire warnings. [IPCC report: 'Code red' for human driven global heating, warns UN chief | UN News](#) We have been told by even more conservative organizations like the International Energy Agency - again in stark terms- that we need to stop using fossil fuels immediately. We have been told by our own national security agencies. Collectively, as a society, are we deaf dumb and mute? It appears we are.

Second of all, we were promised a NET-ZERO code – but we have not gotten a net-zero code. Electrification must be a requirement, as these international agencies and many who have written letters and submitted testimony - have urged – for ALL new buildings and major renovations. Not just for homes greater than 4000 square feet but for ALL new and

substantially renovated homes. Any building built today with FFs will need to be retrofitted at far greater cost and complexity almost immediately to meet the State's climate goals. It is NOT ACCEPTABLE to be installing stranded assets, wasting money, creating unhealthy indoor and outdoor air quality, and burdening our energy infrastructure.

Thirdly, the cost definition threshold for substantial improvements is not a viable one. This definition should be 50% of the enclosed area without any reference to cost. Any threshold using cost-to-value burdens low-value buildings in environmental justice communities and relaxes standards for wealthy communities. It also allows for rampant cheating, which our Brookline Chief building inspector first pointed out when we were passing our fossil fuel prohibition in Brookline back in the fall of 2019. Drop this cost definition and stick with one that everyone already uses and understands.

And last but not least. The AG wrote in comments that the DOER codes must meet the 2030 goal of 50% reduction of carbon emissions, which is a state MANDATE. We have not seen any proof that the current DOER standards will meet these goals, contrary to the AG's comments. In addition, DOER should use current electric and gas prices to model their life-cycle costs - not costs that are two years old. DOER has already stated that all-electric buildings are IN ALL CASES have a better life-cycle cost than those with fossil fuels, and DOER is mandated to produce building codes that minimize life-cycle costs. Back to point one and two – everything must be electrified and net-zero in order to meet our climate goals.

We know that we face a “code red” climate crisis and that what we do now – not in a year or two, and not in a decade or two – but RIGHT NOW – is essential to maintaining some semblance of life as we know it on this planet. Not just for our children and grandchildren, but for ourselves. And not just for ourselves, but for those who will suffer the worst consequences of our wanton destruction of this planet.

Thank you for the opportunity to testify.

Please stop this madness.

Sincerely,

Lisa Cunningham, Architect
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Co-founder, ZeroCarbonMA – Reconciling climate policy with climate reality
www.zerocarbonma.org