



Maggie McCarey  
Director – Energy Efficiency Division  
MA Department of Energy Resources  
100 Cambridge St. Suite 1020  
Boston, MA 02114

March 4, 2022

Re: Stretch Code Straw Proposal Comments

The primary goal of the optional stretch energy code is least cost decarbonization. Massachusetts Municipal Wholesale Electric Company (MMWEC), the Commonwealth's designated joint action agency for municipal utilities, agrees with this goal. The municipal utility members of MMWEC are already on average more than 50% decarbonized, well on pace to meet net zero goals for 2050 as required under the Global Warming Solutions Act (GWSA) and recently passed climate legislation. However, after reading the proposed code we strongly object to any standard that mandates solar photovoltaic (PV) installation as an optionality for compliance when utilized with fossil fuel heating.

As electric utility providers, we are aware of the high costs of retrofits for solar and EV installations after building construction. Therefore, we are greatly in favor of EV-ready charging infrastructure. Additionally, we are in favor of PV ready as an option in building construction. We believe something as simple as a dual socket home meter box complying with the interconnection standards of the local utility could be accomplished for minimal incremental costs and allow for streamlining of solar installations now or a decade in the future. However, not all new homes are conducive to cost effective solar.

As utility providers, we have a responsibility to not only deliver carbon neutral energy to our customers, but ensure reliability. Dense pockets of rooftop solar may pose reliability issues on distribution systems. Solar installations on lots that are not conducive to high rates of solar generation will increase housing costs with no offsetting benefit to electric generation, and could also lead to distribution investments that aren't optimal, increasing costs with no offsetting benefit. For example, requiring solar by building code on a treed lot or with primarily northern exposure will lead to a wasted investment. As shown in California, widespread, uncontrolled solar proliferation at the distribution level led to a scramble for resources needed to balance the intermittent swings of solar, including distribution level batteries, capacitor banks, voltage regulators, etc.

While for many years the New England power grid has acted as a sink for excess mid-day solar power, the system is quickly reaching the point where the grid will no longer have large-scale increases in solar proliferation. The impacts and costs to the grid and also Massachusetts customers will only increase. Community solar may be an alternative that addresses some of these concerns, where the building code allows residential construction on lots with suboptimal solar energy characteristics. Community solar installations will also allow resources to be placed in areas that will have the least impact on the existing electric distribution infrastructure, reducing cost impacts on communities.

As stated in the straw proposal, the intent of this proposal is decarbonization of the building sector consistent with the 2050 roadmap. To that end, all-electric heating through air source heat pumps (ASHPs) and ground source heat pumps (GSHPs) for building heat and domestic hot water, as well as electrification of clothes drying and cooking, can be accomplished through this optional stretch code. As the electric generation sector strives toward 2050 net zero carbon emissions goals, to add PV mandates or requirements for PV generation with gas heating is not only inconsistent with the 2050 roadmap but also imposes a hurdle to home builders and electric utilities as

we seek to continue to modernize the grid and deliver reliable low-cost carbon neutral generation to meet the goals of the 2050 roadmap.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. DeCurzio', is positioned above the printed name.

Ronald C. DeCurzio  
CEO, MMWEC