



August 9, 2022

Department of Energy Resources (DOER)
100 Cambridge St., Suite 1020
Boston, MA 02114

Re: Green Energy Consumers Alliance's Comments on Proposed Stretch Code

Green Energy Consumers is a nonprofit based in Boston with a mission to harness the power of energy consumers to speed the transition to a zero-carbon future. This year, we are celebrating our 40th year as an organization dedicated to helping consumers find and adopt clean energy solutions. On behalf of the organization, **I am writing to urge the Department to promulgate rules that would allow communities to adopt a fossil-fuel-free stretch code; specifically, one that would require heating to be provided by electricity rather than allowing a fossil fuel pathway of some kind.**

Perhaps the most compelling argument in favor of such a stretch code in 2022 is the basic reality that the law in the Commonwealth requires state-wide greenhouse gas (GHG) emissions to be net zero by 2050. A building constructed in the near future with fossil-fuel-based heating would be kicking the can down the road because eventually the heating system would have to be replaced with electrification. It's simply more efficient and effective to make the building all-electric with new construction.

However, the United States Senate has provided us with another compelling argument by passing the Inflation Reduction Act (IRA), which contains \$369 billion in incentives for green energy. The IRA gives generous treatment to heat pumps. At this writing, we expect the House to pass the IRA and send it to President Biden for his signature. IRA changes the calculus on building energy tremendously. Whatever modeling the Massachusetts Department of Energy Resources (DOER) has done to weigh the benefits and costs of an all-electric stretch code must be reconsidered in this light. **Simply put, IRA makes a net-zero stretch code more feasible than when DOER released its Straw Proposal.**

To those key points, I will add:

- The requirement for on-site solar should be expanded.
- Propane is not a helpful substitution, environmentally or economically, for methane or heating oil.
- DOER should release details of the modeling that went into the decision to set the 2030 GHG emissions sub-limit for residential and commercial buildings identified in the Clean Energy and Climate Plan for 2025 and 2030 (CECP). Based on our reading



of the CECP, it is impossible to discern how much GHG reduction would be garnered by specific policies, such as those listed for building codes, Mass Save, the Clean Heat Standard, etc. Specifically with respect to the stretch code, it would be useful to know how much GHG reduction would be left on the table by a stretch code that would allow for a fossil fuel pathway. It would also be useful to know how many communities DOER assumes would adopt a net zero stretch code. The relevance is that any GHG reductions not captured here will have to be “offset” by larger reductions in existing buildings.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink, reading "Larry F. Chretien". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Larry Chretien, Executive Director

larry@greenenergyconsumers.org