



August 12, 2022

Ian Finlayson  
Department of Energy Resources  
100 Cambridge St, Suite 1020  
Boston, MA 02114

**Re: Stretch code comments**

Dear Mr. Finlayson,

Thank you for the opportunity to offer comments on the updated stretch code and the new specialized stretch code. I am writing on behalf of Environment Massachusetts, the statewide environmental advocacy organization. We work to protect clean air, clean water, and open spaces, together with our thousands of citizen members and supporters.

The energy we use to heat, cool, and provide electricity for our buildings is responsible for more than 40 percent of Massachusetts' greenhouse gas emissions. The oil and gas we burn in our buildings is also a major source of air pollution. Exposure to this pollution inside and outside our homes is linked to a wide range of health problems, including asthma, heart attack, and preterm birth.

We can make our buildings much more energy-efficient and we can replace fossil fuel heating systems with clean alternatives like heat pumps — and the easiest place to start is with new buildings. Every new building is an opportunity to put Massachusetts on a path to a cleaner, healthier future. Building fossil-fuel-free, highly efficient new buildings will also help to expand the market and bring down costs for the technologies that are needed to retrofit existing buildings.

Massachusetts' building codes should require new buildings in every community to meet high standards for energy efficiency and use clean heating and cooking technologies. In the short term, allowing municipalities to opt into these requirements, through the stretch code and the specialized stretch code, is an important step forward.

We thank DOER for strengthening energy efficiency requirements in both the stretch code and the specialized stretch code. In particular, stronger HERS score requirements will lead to improvements in the energy performance of building envelopes and appliances.

At this stage, we are offering feedback on two aspects of the proposed specialized stretch code:

**The specialized stretch code should require fossil-fuel-free construction.**

Every new home or commercial building that is built with gas heating today will need to be retrofitted with electric heating over the coming decades in order to meet Massachusetts' climate goals. This only adds to the considerable logistical and cost challenges facing the Commonwealth as we transition away from fossil fuels. Additionally, a growing body of research links the fossil fuels we use in our homes — particularly for cooking our food — to poor indoor air quality and negative health outcomes.

Rather than exposing residents to dangerous pollution and mandating potentially costly retrofits down the road, it makes much more sense to require fossil-fuel-free, all-electric construction up front. The new climate bill, signed into law on August 11, will allow up to 10 municipalities to require new buildings to be all-electric. We should expand this opportunity to other communities, and the specialized stretch code is one way to do so. DOER should modify the proposed specialized stretch code to require fossil-fuel-free construction in all residential and commercial buildings.

**The specialized stretch code should require rooftop solar on all suitable buildings.**

Massachusetts has tremendous potential to generate clean electricity from rooftop solar panels. Requiring solar panels on the roofs of all new homes would add more than 2,300 megawatts of solar generation capacity by 2045, according to a report from the Environment Massachusetts Research & Policy Center.<sup>1</sup>

Requiring solar to be installed at the time of construction may help to lower the cost of going solar when compared to installing solar panels at a later date. It is typically cheaper to install solar panels when workers are already on the roof. Builders and architects can also consider how to maximize rooftop solar exposure when they design a new building.

The proposed specialized stretch code would require rooftop solar only on homes and commercial buildings that are heated with fossil fuels. This requirement should extend to all new residential and commercial buildings where there is suitable rooftop solar exposure.

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<sup>1</sup> *Solar Homes: The Next Step for Clean Energy*, Rob Sargent and Bret Fanshaw, Environment America Research & Policy Center and Abi Bradford and Jonathan Sundby, Frontier Group, December 2018, <<https://environmentmassachusetts.org/feature/ame/solar-homes>>.

Thank you for your consideration. You may contact me with any questions at [ben@environmentmassachusetts.org](mailto:ben@environmentmassachusetts.org) or 914-420-9706.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Hellerstein", with a long horizontal stroke extending to the right.

Ben Hellerstein  
State Director  
Environment Massachusetts