



BERKSHIRE ENVIRONMENTAL ACTION TEAM
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Protecting the environment for wildlife in support of the natural world that sustains us all.

August 12, 2022

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

via email to stretchcode@mass.gov

Re: Stretch Energy Code and Specialized Stretch Code Draft Regulation

Dear Ian Finlayson,

Please accept the following comments from the Berkshire Environmental Action Team (BEAT). BEAT's mission is to protect the environment for wildlife in support of the natural world that sustains us all.

BEAT believes that DOER must create a specialized stretch energy code that eliminates the fossil fuel pathway for new construction and instead requires all building types and sizes be constructed all-electric. This code will be vital for addressing the climate emergency and protecting environmental justice communities from further harm.

We concur with the comments provided by the Massachusetts Climate Action Network (MCAN), especially, but not limited to:

— **Defining net zero** as “a home that is affordable to heat and cool, has healthy indoor air due to all electric cookstoves, and has access to renewable energy -- either on site or bought off site” and a true net zero building as one that “does not allow for on-site combustion of fossil fuels”.

— **We demand that the DOER eliminate the fossil fuel pathway** in the current draft of the specialized opt-in code. Allowing fossil fuels in new buildings leaves low income residents bearing the burdens of rising costs of heating with fossil fuels as more people transition to clean energy as more affluent residents can afford to retrofit to all-electric. This is unacceptable.

New federal and state policies incentivizing heat pump retrofits for low- and moderate-income ratepayers will work in coordination with a net zero stretch code to ensure that low-income ratepayers are equally able to benefit from the switch to all-electric buildings.

Leaving fossil fuel pathways out of the specialized opt-in code is by far the most sensible choice for our economy, for public health and for climate.

— **We demand that DOER ensures that the specialized net zero stretch energy code aligns with the state’s 2030/2050 emissions targets.** This must be done by correcting their previously conducted cost studies to reflect current gas and electricity prices and add significant cost premiums for retrofitting fossil-fuel heated buildings.

— **We demand that DOER include provisions requiring all-electric heating and cooling systems and appliances. Electrical pre-wiring does not go far enough.** The specialized stretch energy code provisions must require primary heating and cooling systems, appliances and other systems to be 100% electric. All-electric buildings can take full advantage of renewable energy and provide cost-effective heating and air-conditioning and do not produce climate and health-impacting emissions.

— **On-site solar generation provisions must be expanded and clarified in the specialized stretch code.** This code provision must apply to all buildings (not just those heated by fossil fuels), and require on-site solar panels in proportion to gross square feet relative to the extent of available solar access.

- A true net zero stretch code requiring renewable energy to offset 100% annual site emissions is needed to level emissions.
- A true net zero stretch code would provide buildings to be powered by 100% renewable energy (either generated on-site or purchased from off-site sources).
- A net zero building has 3 piers to its foundation: high energy efficiency; all-electric; and renewable energy. Not requiring renewable energy in the revised specialized stretch code means that the state is not able to meet our 2030 mandated targets to reduce emissions from buildings.

— **The specialized stretch code must apply to all renovations involving fossil fuel appliances or alterations to the majority of a structure.** Smaller renovations are a significant part of the building activities in MA. The most cost effective time for existing buildings of any size to transition to all-electric clean energy technology, like a heat pump, is during routine home improvements or when an older HVAC system must be replaced. Provisions for this already exist in the Next Generation Climate Roadmap Act and the 2050 Decarbonization Roadmap. The specialized stretch code needs to reflect this.

— **We strongly urge that DOER include Workforce Development in the Net Zero Stretch Code.** State-supported workforce training for heat pump retrofits, is mandated by the Next Generation Roadmap Act. A true net zero stretch code will leverage state investment in jobs training and electrification incentives, ensuring good jobs and a strong economy.

— **DOER needs to restore the deleted embodied carbon provisions.** This includes requiring Whole Building Life Cycle Assessment to account for and minimize embodied carbon. Reducing embodied carbon for all building types needs to be included in the future revisions of the specialized stretch energy code.

— **We demand that DOER must produce a finalized, true net zero specialized stretch energy code for municipal adoption by the end of 2022.** Actions taken to address climate change THIS DECADE matter the most, according to climate scientists. Driving down emissions NOW will help avoid the worst climate impacts in the future.

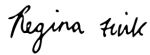
Do not delay implementation of the specialized net zero stretch code.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jane Winn".

Jane Winn, Executive Director

A handwritten signature in black ink, appearing to read "Regina Fink".

Regina Fink, Program Associate

A handwritten signature in black ink, appearing to read "Lucas Forman".

Lucas Forman, Program Associate