



February 9, 2022

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Boston, MA 02135

Energy Efficiency Division
Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA 02114

RE: Comments on the Municipal Fossil Fuel Free Demonstration Project Regulation and Model Rule Development

Greetings,

Thank you for the opportunity to provide comments on the Municipal Fossil Fuel Free Demonstration Program's project regulation and model rule. My name is Miranda D'Oleo and I am the Buildings Campaign Director at Massachusetts Climate Action Network (MCAN). We are an advocacy organization with over 65 chapters across the state that empowers local communities to take climate action by equitably decarbonizing our buildings and accelerating the transition of municipal utilities to clean energy.

MCAN applauds DOER for proposing a comprehensive project regulation and model rule for the Municipal Fossil Fuel Free Building Demonstration Program. In particular, we appreciate DOER's proposal to ensure that the Demonstration Program works hand-in-hand with existing regulations by requiring the communities who will be participating to also opt-in to the specialized stretch code.

Effective building decarbonization can only be achieved by electrifying buildings and significantly enhancing building efficiency. By proposing this cohesive approach, DOER is creating a pathway for participating communities to effectively eliminate the use of fossil fuels in new construction while significantly enhancing energy efficiency.

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This pathway for communities participating in the Demonstration Program would achieve exactly what thousands of residents, dozens of experts, and countless organizations had been calling for the specialized stretch code to do - establish an all-electric, truly net-zero building code for communities in our Commonwealth.

Unfortunately, while it is a critical development in our efforts to reduce emissions from buildings, that is not what the specialized stretch code offers. It falls short of being net-zero by still providing a pathway for the use of fossil fuels in new construction.

Instead, only a very select group of 10 communities will now have access to the all-electric, truly net-zero pathway for new building construction that so many had been advocating for.

This restriction is unjustified and unacceptable.

The program must be expanded to ensure that every city and town that wishes to do so is able to participate in this fossil-free option. In particular, communities like Worcester and Boston which contain a large number of Environmental Justice communities and who are on the waitlist to participate, should have the opportunity to opt in.

We know that the future is electric because all-electric buildings increase climate resiliency, improve health outcomes, and reduce emissions. In light of the inevitable, we should not be shutting out communities, especially those who stand to benefit the most, from opportunities to accelerate their transition now.

DOER must amend this program to have no cap on the number of participating communities.

In addition to expanding this demonstration, DOER must ensure that the reporting and assessment of this program contain sufficient information to enable the legislature to effectively advance equitable decarbonization and electrification.

Specifically, in addition to the other reporting and assessments outlined in the Project Regulation, DOER should also recommend to the legislature whether the Demonstration Program should be expanded to include more communities, in the event that they are unable to expand it themselves. This recommendation could propose that the Demonstration Project be incorporated into the Specialized Stretch Code.

Furthermore, DOER should report on the impact, if any, that the Demonstration Project is having on the development and preservation of affordable housing. If there is evidence to suggest that affordable housing is being adversely impacted in any way by the requirements of the

Demonstration Project, DOER should include recommendations for policies or support mechanisms that would prevent this and advance affordable housing in fossil-free communities.

Ultimately, DOER has the clear and critical opportunity right now to accelerate the transformation of all new construction from being polluters to being protectors of our health, communities, and our climate. We at MCAN urge you to take this opportunity by making this program available to all communities and conducting assessments that ensure the protection of affordable housing.

Thank you for the opportunity to comment and for your efforts to advance equitable building decarbonization.

Sincerely,

A handwritten signature in black ink that reads "Miranda D'Leo". The script is fluid and cursive, with the first letters of each word being capitalized and larger than the rest of the letters.

Miranda D'Leo
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