



June 27, 2016

Dear Chairman Crowley and BBRS Members,

Sierra Club submitted a letter to you on May 31 with recommendations on strengthening the draft stretch code (jointly signed with other organizations).

We are submitting these additional comments to respond to the June 3 *Boston Business Journal* op-ed by David Begelfer.

The article claimed that “The new stretch energy code would require a 15% increase in energy efficiency over the current code.”

- **Only the very largest new buildings would be subject to this 15% increase**, and these building types are already frequently designed to meet and exceed this level of efficiency (through programs like LEED). **For the vast majority of the state’s commercial buildings, the stretch code would require an 8%, not 15%, increase in energy efficiency beyond the current code** because the stretch code itself would provide 0% additional savings beyond the proposed base code.

The article also claimed that, “Since the Green Communities Act requires the adoption of the latest IECC (every three years), the Commonwealth’s position as a national leader in energy efficiency will be ensured even without a Stretch Code.”

- This perhaps used to be true, but **simply adopting the latest version of the IECC unfortunately no longer guarantees progress**. The most notable example of this is in the residential energy code, as the 2015 IECC as well as the forthcoming 2018 IECC offer essentially no improvements in energy efficiency. Today the leading states in energy efficiency are pushing beyond the IECC, as **states like Vermont and Rhode Island and the District of Columbia have committed to developing stretch codes that go beyond the 2015 IECC** because they have deemed that the newer versions of the IECC are not efficient enough to meet the needs of their citizens.

Lastly according to Mr. Begelfer, “It is important to note that there is no statutory requirement to adopt or update a Stretch Energy Code. There is no mention of it in any statute, and it is only the Department of Energy Resources’ (DOER) policy that encourages the creation of this code.”

- **The stretch code was developed in response to the needs of Massachusetts communities** that wanted to achieve higher levels of energy efficiency in their buildings without burdening the industry with different energy codes in each jurisdiction (as is done in other states). **And this need still exists**, with some stretch code communities

Massachusetts Sierra Club  
June 27, 2016  
Page 2

indicating that they will pursue development of their own codes if the stretch code does not reach appreciably far beyond the state's base code.

Thank you for taking these additional comments under consideration.

Sincerely yours,

Emily Norton  
Chapter Director