



The Green Engineer, Inc.

Sustainable Design Consulting

Department of Public Safety

June 18, 2016

Attn: Stephen Carley

Re: Proposed Changes to 780 CMR, State Board of Building Regulations and Standards: CHAPTER 13.00: Energy Efficiency; CHAPTER 51.00: Massachusetts Residential Code (Chapter 11 and Appendix U); APPENDIX 115.AA: Stretch Energy Code

To whom it may concern:

I write in support of the proposed changes to the Massachusetts Energy Code.

Climate Change is the critical problem facing our planet today. The buildings sector is responsible for nearly half of carbon emissions in the US, so building codes are one of the most effective tools we have to fight climate change and meet the State's emission reduction goals.

Massachusetts has long held a leadership position in energy efficiency in the US. Regular updates to our State Energy Code will maintain our leadership position, will provide certainty to the construction sector, and will support the thousands of green tech jobs in Massachusetts.

My own company's story reflects the success of Massachusetts's energy policy. Founded in 2005, The Green Engineer, Inc. now employs 19 people, working to make our buildings more efficient and better for the planet.

I do have one specific comment regarding a clarification I believe is required in the proposed amendments to Chapter 13.

C401.2.1 as amended makes the IECC Additional Efficiency Package Options part of the ASHRAE 90.1 pathway. We assume this only applies to the prescriptive and trade-off options in 90.1, not the performance option, although the language is not clear. Under IECC, projects following C407 Total Building Performance don't have to comply with C406.1. We assume the same should hold true for the 90.1 option. This should be clarified.

Christopher Schaffner, PE, LEED Fellow
President
The Green Engineer, Inc.