
From: Zemel, Felix (DPS)
Sent: Wednesday, June 15, 2016 10:11 AM
To: Carley, Stephen (DPS)
Cc: Zemel, Felix (DPS)
Subject: FW: re. 2015 IECC amendment to

Felix J. Zemel
Department of Public Safety
Technical Director / Acting Chief of Inspections -- Building

From: Tom Swenssc
Sent: Tuesday, June 14, 2016 5:29 PM
To: Zemel, Felix (DPS)
Subject: re. 2015 IECC amendment to


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I attended your introduction to the HBRACC last year and appreciated your enthusiasm given the task at hand. Matt Anderson (our HBRACC President) sent the following regarding the proposal to adopt 2015 IECC expressing a number of concerns. I am personally a very energy conscientious person and try to project that to my clients. However, I have more and more difficulty doing that beyond what I believe is necessary at this point. We've come to a point where we need to determine as a state what is necessary and what is over zealous. We need to conserve, of that there is no doubt, never has been, and we are in fact late to the game. Now I feel like we're trying to make up for lost time. Enough of the rant, we simply need to arrive at a compromise so we don't lose the interest of those we can convince all the conservation is a good thing. Of the items listed below the electric vehicle charging and the solar panels are unnecessary additions to building costs. This is just 'jump on the band wagon' stuff. Especially since the money spent may be on an obsolete technology when it comes time to install it. The other items are probably going to hit us sooner or later, and they are easier to take into consideration albeit they do add to the ever increasing cost. Thanks for listening.

Tom Swensson
Brown Lindquist Fenuccio & Raber Architects Inc.



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Today the Board of Building Regulations and Standards (BBRS) will hold a hearing at 1:00 PM to provide an opportunity for public comment and/or testimony related to the proposed adoption of the 2015 International Energy Conservation Code (IECC), as an amendment to the eighth edition of the Massachusetts State Building Code, 780 CMR.

The 8th Edition amendments include new energy conservation provisions which require among other things:

- 1) a lower HERS rating for new construction;
- 2) one or more electric vehicle 40 amp wired circuits for electric vehicle charging, depending on number of dwelling units in the building;
- 3) certified testers for whole house or duct air leakage; and,
- 4) more energy efficient fenestration (U-factor lowered from .32 to .30); and,
- 5) for new construction buildings, plans will require that a zone of the roof area be designated as the SOLAR-READY ZONE for the future installation of a solar photovoltaic or solar thermal system, with limited exceptions.

Liz Kovach, HBRACC member & past president, and current State Assn president along with several other members from across the state will attend this meeting to testify against these proposed amendments which,

We have been informed that there will be about 300 pro solar ready and pro electronic vehicle charging station ready proponents at tomorrow's BBRS meeting.

Please send an email to Felix Zemel voicing your opposition to these amendments. Please use the below points provided by Guy Webb, EO of Central MA, who will testify today to the BBRS explaining why we oppose these amendments. Thank you to President Liz Kovach, Guy Webb, Scott Colwell, and former HBRAMA President and BBRS Member Michael McDowell for their tireless efforts to prevent the adoption of burdensome new requirements for our building industry.

Felix I. Zemel, MCP, MPH, CBO, RS, DAAS
Department of Public Safety
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After careful review of the proposed requirement referenced above I wish to express some concerns. I am opposed to the adoption of the provision for the reasons stated below.

1. Authority

It is my opinion that the proposed requirement referenced above does not fall under the scope of the powers and duties of the BBRs as provided by M.G.L. ch. 143, sections 94 and 95. It is unrelated to the BBRs' mandate of life safety/public safety and does not provide for energy conservation of the home.

2. Cost

The majority of new single family and two-family homes are built with a 200amp electrical service in which the entire panel is in use. A provision that mandates an open 40amp slot be provided would more often than not require either the addition of a sub-panel or an upgrade to the electrical service to 300amps, an additional cost of approximately \$1,000.

3. Applicability

It is extremely likely that the vast majority of those who purchase an electric vehicle, either now or in the near future, will live in an existing structure that is highly unlikely to have an electric vehicle charging station. Consumers who choose to purchase an electric vehicle do so with the full knowledge that it will someday need to be recharged and will make the necessary changes to their home. It is in most cases no more expensive to add an electric vehicle charging station to an existing home than to a new home.

Further, as other technologies such as fuel cells advance, the demand for electric vehicles may never reach the level that seems to be assumed by the proposed mandate.

Regarding new single family homes - Builders are very responsive to the market and the demands of their customers. They will provide electric vehicle charging stations voluntarily as demand escalates. The current demand for electric vehicle charging stations is extremely low but if it does increase, builders will quickly prepare their homes with the necessary infrastructure as part of their normal standard features.

4. Summary

In short, it makes no sense to require electric vehicle charging station infrastructure in new 1 and 2 family homes when it will add cost to the home, may never be used, and is easily added post-construction if the homeowner chooses to do so. Furthermore, as noted above, the BBRs does not have it within their powers and duties as authorized by the Legislature to issue such a mandate as part of the Building Code.