



August 12, 2022

The Coalition for Community Solar Access (CCSA) submits these comments to the Department of Energy Resources (DOER) on the proposed draft Stretch Energy Code and Specialized Opt-in Codes. The stretch code is a critical tool to ensuring that future Massachusetts based construction is part of the plan to continue towards our larger decarbonization goals. CCSA supports the inclusion of community solar as part of the Stretch Energy Code, as it represents an important alternative for construction sites that cannot build enough onsite renewable energy to meet the standards of the code. We appreciate the work that the DOER has done in developing and finalizing the Stretch Energy Code, and look forward to the final implementation of these standards.

CCSA is a national Coalition of businesses and non-profits working to expand customer choice and access to solar for all American households and businesses through community solar. Our mission is to empower every American energy consumer with the option to choose local, clean, and affordable community solar. We work with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure community solar programs provide a win, win, win for all, starting with the customer.

**CCSA support the inclusion of community based renewable generation for eligibility as a Zero Energy Building in the Commercial Code**

The draft Commercial Specialized Stretch Energy Code contains a definition for Zero Energy Building as follows:

**ZERO ENERGY BUILDING.** A building which through a combination of highly energy efficiency design and onsite or community-based renewable energy generation is designed to result in net zero energy consumption over the course of a year as measured in MMBtus or KWheq, on a site energy basis, excluding energy use for charging vehicles.

CCSA supports the inclusion of community based renewable energy generation in the proposed definition, as it allows commercial projects that may face onsite physical limitations to building onsite renewable energy to be able to satisfy the zero energy building criteria.

## **CCSA recommends including community based renewable generation for eligibility as a Zero Energy Building in the Residential Code**

Similarly, CCSA supports consistency between the commercial and residential codes, and encourages the inclusion of community based renewable energy to meet the criteria for a Zero Energy Building in the Residential code. Residential development may similarly face site limitations to constructing on site renewable energy, and should be allowed an opportunity to satisfy the Zero Energy Building classification with community based renewables, in the same way that commercial buildings can.

Finally, CCSA recommends that additional guidance can be provided to building code inspectors regarding how the DOER qualifies community solar projects. While there are no physical installations to inspect for a community solar project at the building site in question, Customer Disclosure Forms that are required for enrollment in the current DOER incentive program, the SMART program, are easy to check. Barring that, a customer contract should be available to verify.

We thank the DOER for the work done to finalize these stretch energy codes. With a slight modification to enable residential projects to use community based renewable energy to satisfy the Zero Energy Building criteria, this will establish an important foundation to reaching the Commonwealth's decarbonization goals.

Thank you for your consideration of these comments. If you have any questions on this comment, please direct them to Kaitlin Kelly O'Neill at [Kaitlin@communitysolaraccess.org](mailto:Kaitlin@communitysolaraccess.org).

Sincerely,

Kaitlin Kelly O'Neill  
Northeast Regional Director  
Coalition for Community Solar Access