

August 12, 2022

Via E-mail

Ms. Nina Mascarenhas
Department of Energy Resources
100 Cambridge Street., Suite 1020
Boston, MA 02114

RE: Stretch Energy Code and Specialized Stretch Code Draft Regulations

Dear Ms. Mascarenhas:

National Grid (the “Company”) appreciates the opportunity to provide comments on the June 24, 2022, draft building code regulations set forth by the Department of Energy Resources (“DOER”) updating the Base Energy Code, Stretch Energy Code, and developing the new, Specialized Opt-in Energy Code (collectively the “draft building codes”).

Overall, National Grid is supportive of the language in the draft building codes. The Stretch Energy Code, and the newly developed Specialized Opt-in Energy Code (collectively the “draft stretch codes”) as proposed by DOER would be a step in the right direction for the Commonwealth’s climate goals, including achieving the economy wide emissions and building-specific emissions sublimits that were established in the final 2025/2030 Massachusetts Clean Energy Climate Plan (“CECP”) published by the Executive Office of Energy and Environmental Affairs (“EEA”) on June 30, 2022.

As these regulations are finalized, National Grid encourages DOER to retain key features of the original building codes that are designed to maximize broad acceptance by Massachusetts’ customers and ensure the most affordable means of achieving emissions reductions for the Commonwealth. National Grid believes the draft building code provisions for heating compliance offer a balanced and sensible approach for customers and encourage DOER to fully consider any comments from the building community that provide additional information on the cost, availability, and customer awareness of heating options under the codes. Given the current inflationary environment facing our customers, as well as ongoing energy affordability challenges for low-and-moderate income customers, cost impacts should be considered as the draft stretch codes are finalized and implemented.

Optionality for Heating Compliance

As provided in National Grid's original comments on DOER's draft building code (dated March 17, 2022), the Company supports DOER's proposal to both increase the stringency of efficiency levels required in the draft stretch codes and allow for optionality for heating compliance. The draft stretch codes recognize customer choice in heating equipment, including an option to use heating fuels with an increased level of building efficiency. This approach appropriately balances building owners' diverse heating needs and preferences today, with clear requirements for efficiency and significant emissions reductions in the near-term.

National Grid also supports DOER's proposed definition for Net-Zero construction, namely: "A building which is consistent with achievement of MA 2050 net zero emissions, through a combination of highly energy efficient design together with being either a Zero Energy Building, or an All-Electric Building, or where fossil fuels are utilized, a building fully pre-wired for future electrification and that generates solar power on-site from the available Potential Solar Zone Area."

Effective Dates

National Grid supports the phase-in period for the draft stretch codes.

Under the current draft, the effective dates of the Specialized Opt-in Code will depend on when the municipality votes to adopt it. These phase-in dates are beneficial for town residents and prospective town residents who may want to build a new home in that community as they will have time to adapt to the new stretch code requirements. Establishing a phase-in period will allow time for contractors, developers, and code officials to familiarize themselves with building practices and techniques that will achieve the targeted HERS scores.

Alignment with Mass Save Programmatic Support

National Grid should continue to be able to use the same energy efficiency program baselines across the Commonwealth regardless of a municipality's adopted building code. National Grid recommends that, within the final building codes, DOER formalize the long-standing agreement between the Program Administrators, DOER, and other stakeholders to bring certainty to the market and ensure the energy efficiency programs continue as designed.

Electric Vehicle (“EV”) Specific Recommendations

In the final building codes, National Grid recommends inclusion of the following additional measures:

- All residential and multi-family building groups should be required to offer one EV Ready Space per housing unit or one EV Ready Space per parking spot, whichever is fewer.
- EV Ready Space requirements should be increased for other commercial building groups.

At home EV charging is critically important in enabling EV adoption and minimizing the impact of EV charging on the electric grid. National Grid’s experience suggests that 95% of existing EV owners have access to at home charging,¹ more than 80% of EV charging is typically done at home, and that at home EV charging helps enable and sustain affordable and equitable EV ownership.² Further, the long dwell times of vehicles at home create a significant degree of flexibility for EV charging, helping to reduce EV contributions to peak loads and potentially enabling other grid benefits in the future.

Given that the Commonwealth is on track to require 100% of new light duty vehicle sales to be zero emissions by 2035³ and the average lifespan of new construction will extend well beyond 2035, National Grid recommends instituting these EV Ready Space requirements for residential and multi-family new construction starting in 2024. Further, National Grid proposed in the Massachusetts’ Department of Public Utilities (DPU) Docket 21-91 to support EV Ready Site Plans for Multi-Unit Dwelling (“MUDs”) to plan to provide one Level 2 charging port per residential unit, similar to the recommendation in the current draft building codes for new construction.⁴

Regarding other commercial buildings, the long-term EV charging needs for any given building are not as clear as they are for residential and multi-family properties. The draft stretch codes currently propose that up to 20% of parking spaces be pre-wired for future electrification. The Company views that there is room to increase the number of required EV Ready Spaces but is mindful of not requiring too many, given the diversity of customer needs. Further study is warranted to determine the appropriate requirements for each building group, including the use of “EV Capable” parking designations.

¹¹ 2020 Survey of Rhode Island EV owners as part of the Rhode Island Electric Transportation Initiative Evaluation Final Report – Rate Year 2, page 17 [http://www.ripuc.ri.gov/eventsactions/docket/4770-NGrid-RY2%20Transportation%20Initiative%20Annual%20Report%20Combined%20\(10.30.2020\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/4770-NGrid-RY2%20Transportation%20Initiative%20Annual%20Report%20Combined%20(10.30.2020).pdf)

² Hardman, Scott (2021), Discontinuance among California’s electric vehicle buyers: Why are some consumers abandoning their electric vehicles? <https://escholarship.org/uc/item/11n6f4hs>

³ *Transportation Sector Report, A Technical Report of the Massachusetts 2050 Decarbonization Roadmap Study*, December 31, 2020, page 8.

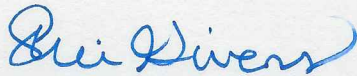
⁴ D.P.U. 21-91, Exhibit NG-EVPP-1 at 66-68.

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Conclusion

National Grid appreciates DOER's extensive development process and inclusive stakeholder engagement that is reflected in the June 2022 draft building codes. The Company is pleased to offer these additional comments for DOER's consideration.

Sincerely,



Sheri Givens
Vice President
US Policy & Regulatory Strategy

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