



Northeast Hearth, Patio, and Barbecue Association

PO Box 28, Sudbury, MA 01776 . 978-440-0344 . nehpba.org

7/21/2022

Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114

Good afternoon,

My name is Karen Arpino and I am writing on behalf of The Northeast Hearth, Patio & Barbecue Association. The Northeast Hearth, Patio & Barbecue Association (NEHPBA) is a trade association representing more than 300 individual member hearth and fireplace retail and related companies throughout the Northeast. Specifically, in the Commonwealth of Massachusetts, we have over 60-member companies supporting 350 families. The vast majority of our members are independent “mom and pop” small businesses that play a large role in the communities and markets they serve across the Commonwealth.

We must promote access to diverse sources of fuel for our residents, not only to bolster affordable alternatives for powering our homes and businesses but to avoid overreliance on our electric grid. Increased dependency on electricity risks monopolizing energy control within one industry, which would burden the ratepayers of our state by limiting the choices they have available.

As the DOER deliberates the new Stretch Energy Code and Specialized Stretch Code Draft Regulation. We ask that you take our comments below into consideration:

- The DOER webinar claimed that an all-electric house will be cheaper to run, and heat compared to a mixed-use house. In 2019, 51% of Massachusetts constituents used gas to heat their home. Information from the federal registry shows that electricity is far more expensive than natural gas. (See chart below)

Type of energy	Per million Btu ¹
Electricity	\$41.79
Natural Gas	12.09
No. 2 Heating Oil	25.11
Propane	24.46
Kerosene	29.73



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- In Slide 20 of the DOER webinar (7/7/22) it says, “At or below HERS 42, most homes will choose electric heat because heat pumps can lower construction costs for builders and lower ownership costs for buyers.” This statement is incorrect and is likely sourced from the RMI, NBI, or E3 reports, which are based mostly on assumptions. The NAHB report uses real-world costs, saying otherwise; colder climates (e.g., Mass) are significantly more expensive to build and operate than warmer climates (e.g., Arizona).
- If the intent of this stretch code is to reduce GHG (Green House Gas) emissions, regulators should not disincentive the proliferation of gas infrastructure. Without a completely renewable grid, power plants will have to inefficiently burn excess natural gas or coal to meet the increased demand for electricity. The Stretch Code and Specialized Municipal Opt-In Code do not contemplate this problem and only exacerbate it.
- Supply chains are currently having a hard time keeping up producing heat pumps. Large areas of California will soon be mandated to install heat pumps, further straining the demand. If cities go forward with the stretch or special opt-in code, builders and major renovators will be left with no options to heat their homes.
- DOER's definition of net zero is inconsistent with past definitions. “A building which is consistent with achievement of MA 2050 net zero emissions...” is an interesting qualifier, it could be misinterpreted and/or abused to mean anything. We ask that you amend the definition of net zero to explain how it will impact the electric grid.

We must be prudent in our efforts and allow time for technology to catch up before we make such hasty prohibitions on gas infrastructure in new construction. While unintended, these policies would result in a drastic increase in electric rates and the cost of living, along with the possibility of inhibiting access to more affordable sources of fuel and power. These changes would have a major impact on the most vulnerable among us.

Thank you for your consideration of our comments. Please do not hesitate to contact me at (978) 443-0344 or via email at Karen@NEHPBA.org with any questions.

Sincerely,

Karen Arpino
Executive Director
Northeast HPBA



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