



August 12, 2022

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

Via Electronic Mail [stretchcode@mass.gov](mailto:stretchcode@mass.gov)

Regarding 225 CMR 22.00 and 23.00

The New England Geothermal Professionals Association (NEGPA) is pleased to have the opportunity to provide comment on the proposed Stretch Code and Specialized Opt-in Code. NEGPA is a regional non-profit association advocating for the development of ground source heat pump systems as a dependable, cost-effective, and a renewable resource of heating, cooling and hot water energy for New England. We are a group of individuals and companies representing all disciplines involved in the geothermal value chain.

We would like to thank to DOER for your work in developing that current MassSave and Heat Loan programs that are helping grow our industry by enhancing the value proposition that geothermal can offer. We see these Stretch Code updates to be consistent with the mission to electrify the Commonwealth. Having stricter code standards for conventional heating systems is a step in the right direction. We do look forward to the future where highly efficient pumps are the only choice in all new construction.

We would like to propose that like having a Pathway for Passive House, that conventional new construction homes get built mindful of a **Heat Pump Pathway**. A large problem with the deployment of cost-effective ground source heat pump solutions is that the higher temperature distribution systems or low airflow cooling distribution systems are not easily compatible with highly efficient heat pump technology. Adopting new technology to a conventionally designed systems make the future adoption of the new heat pump technology a bigger cost burden.

NEGPA would like to offer our organization as a resource to the Municipalities that adopt the code. We ask that a list of participating municipalities be easily available so that we can engage the decision makers for the long term best practices associated with adopting a heat pump now. With the current market conditions, we firmly believe that geothermal heat pump should be a consideration for every new home or addition. We look forward to making that a reality.

Best regards,

Lawrence H. Lessard  
NEGPA President