



August 12, 2022

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

Dear Commissioner Woodcock,

On behalf of the Greater Boston Chamber of Commerce and our 1,300 members, I write to provide feedback on the Department's Stretch Energy Code and Specialized Stretch Code Draft Regulation. We thank the department for producing a balanced update to the state's Stretch Energy Code and Specialized Opt-in Code that incorporates detailed cost and feasibility analysis while helping reduce carbon emissions.

The updated residential stretch code for one- and two-family homes, town homes, and low-rise multi-family up to three stories, rightly mirrors the straw proposal in balancing emissions reductions, feasibility, and cost factors. The draft regulation reduces the maximum Home Energy Rating Scores (HERS) standard, reflecting improved home efficiency standards. By requiring HERS 45 for all-electric homes and HERS 42 for homes with any use of natural gas, a level at which building with both fuel sources are cost even, consumers will not bear the brunt of significant cost-increases in their utility expenses by eliminating energy sources from the market. At a time of high inflation and housing costs for many Massachusetts residents, this thoughtful approach recognizes the need for practical solutions to reduce building emissions. The final proposal puts forth an important phase-in period for the new standards, waiting until July 1, 2024. Allowing a phase-in period and providing homebuilders with the flexibility to use a variety of available energy sources.

The residential opt-in code goes further by requiring heated homes with natural gas meet the HERS standard and also install pre-wiring for electrification, rooftop solar, and electric heating systems. This important option will create options for developers to invest in cleaner residential buildings. As clean technology becomes more readily available and cost-effective, this option may become a more attractive option for developers.

Like the changes to the residential code, the proposed updates to the commercial building code also will result in demonstrable emissions reductions while maintaining flexibility for builders and businesses. The proposal achieves this balance by emphasizing demand reduction, requiring adaptability for an electric future, and recognizing the nuances of building use. The proposal maintains many of the additional steps that will help reduce demand for building energy consumption, which will act as an additional pathway for emissions reductions. Steps such as implementing Thermal Energy Demand Intensity, or TEDI, limits or instituting ventilation energy recovery, thermal bridges and controlling air infiltration, will also contribute to lowering emissions.

The Chamber appreciates the added clarity brought by the draft regulations. The department has structured these changes in a fair and balanced way by incorporating detailed analysis and developing feasible solutions. We thank the Department for putting forward a thoughtful update to the state's building code that balances our climate goals with containing costs for consumers and homeowners. We hope the department will continue to engage with stakeholders during the implementation of the regulations. Thank you again for the opportunity to comment and please reach out with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads 'James E. Rooney'. The signature is fluid and cursive, with the first name 'James' and last name 'Rooney' clearly legible.

Jim Rooney
President and CEO