

August 12, 2022

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

Re: Draft Code Proposal Comments

Dear Commissioner Woodcock,

Thank you for the opportunity to comment on the Stretch Energy Code and Specialized Stretch Code draft language. According to the Massachusetts 2050 Decarbonization Roadmap Study [Building Sector Report](#), new construction between 2020 and 2050 is expected to make up 19% of the state's building stock by 2050. In 2017, on-site fossil fuel combustion was responsible for [27% of statewide greenhouse gas emissions](#). Given that buildings make up a significant portion of state carbon emissions, the Stretch Energy Code and the Specialized Stretch Code will play an important role in reaching net zero emissions by 2050.

To reach its climate and clean energy goals, Massachusetts will need continued growth in behind-the-meter solar. In the 2050 Decarbonization Roadmap [Energy Pathways Report](#), which models different pathways for the state to reach its decarbonization goals, seven of the eight pathways showed the state reaching 7 gigawatts (GW) of behind-the-meter solar by 2050. In the eighth pathway, 17 GW of behind-the-meter solar would be needed to reach the state's zero emissions goal by 2050. Massachusetts currently has about [1.5 GW of behind-the-meter solar](#).

The same report also highlighted that New England has been one of the most challenging parts of the U.S. to site and construct large-scale renewable energy projects, which will be necessary to achieve net zero emissions by 2050. This fact makes it particularly important for rooftop solar to continue to be incentivized in new construction.

Installing solar during construction of a new home can be more cost effective and allows homeowners to roll the cost of the solar system into their mortgage or finance the system through a third-party financing option. Additionally, installing solar during construction protects the homebuyer from roof warranties being voided later on.

Homeowners that install solar in Massachusetts can experience immediate savings on their utility bills. Massachusetts has the [fifth highest](#) average residential electric price in the country

and the [highest savings](#) estimates for customers who go solar. According to [EnergySage](#), the estimated 20-year savings for a 6 kW solar system in Massachusetts is over \$34,000. At a time when electricity rates are rising quickly, solar can help people lock in energy costs at a set rate for years to come. This effect is much like what energy efficiency measures achieve for families, which building codes and stretch energy codes already emphasize. The energy code should broaden its scope beyond mere efficiency, and include cost-effective measures like on-site clean energy generation, as part of their stretch goals. Massachusetts consumers cannot continue to be held captive by high energy costs. Energy codes that include rooftop solar in addition to strong energy efficiency measures can help free them.

Additionally, all-electric buildings will have big decarbonization benefits for the state, but a study from the [Rocky Mountain Institute](#) shows that all-electric homes can have slightly higher annual electric and gas costs than mixed fuel homes. Solar and all-electric homes are a perfect partnership that allows the state to decarbonize buildings while allowing customers to save money on their electric bills.

The Stretch Energy Code and Specialized Stretch Code are tools that can help the state reach its climate and clean energy goals while helping residents reduce their costs by experiencing savings on their utility bills.

Because of the combined beneficial impact on decarbonization and consumer savings, our feedback on the proposed draft codes is focused on the changes to the compliance credit for solar.

**The Base Code, the Stretch Energy Code, and the Specialized Stretch Energy Code should, at minimum, continue providing solar a five-point credit in the HERS rating for residential buildings.**

Maintaining the five-point credit to solar in the HERS rating provides a clear direction to home builders to include solar in the construction of new homes by acknowledging the addition of clean energy in the HERS score. This direction via the HERS score will help give home builders the guidance needed to ensure the growing interest in adding solar to new homes turns into more homes actually being constructed with rooftop solar. If builders do not get credit for adding solar via the HERS score, then they will not necessarily look to build with it.

In closing, updates to the energy codes should continue to encourage the deployment of rooftop solar on new homes. The five-point compliance credit to solar in the HERS rating is, and

should continue to be, a critical tool in reaching the level of behind-the-meter solar necessary to reach the state's climate, clean energy and consumer goals.

Thank you for your consideration.

Sincerely,

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