



## Northeast Hearth, Patio, and Barbecue Association

PO Box 28, Sudbury, MA 01776 . 978-443-0344 . [nehpba.org](http://nehpba.org)

March 18, 2022

Department of Energy Resources  
One Beacon Street, 5th Floor  
Boston, MA 02108

Good afternoon,

My name is Karen Arpino, and I am the Executive Director of the Northeast Hearth, Patio and Barbecue Association. I am offering these written comments in response to the DOER's Stretch Code Straw Proposal.

The Northeast Hearth, Patio & Barbecue Association (NEHPBA) is a trade association representing over 60-member companies supporting 350 families. The vast majority of our members are independent "mom and pop" small businesses who play a large role in the communities and markets they serve across the Commonwealth.

The Northeast Hearth, Patio & Barbecue Association, appreciates the work that the DOER has spent on creating the new Building Energy Code Straw Proposal, and urges the Committee to take the below points into consideration:

- This code can halt new construction in MA by decreasing residential and commercial inventory, raising mortgage and rent costs and cost of living while failing to reduce carbon emissions. The projects that are being designed now have no code language, which means they will be stopped or put on hold.
- Electrification is not the only route to building sector decarbonization. Presently, new construction in the Commonwealth is challenging and costly enough. Energy costs in New England, electricity in particular, are the highest in the nation. The development of this code must not exacerbate these costs. There is potential for new and decarbonized sources of energy, for example hydrogen and renewable natural gas. These two forms of energy utilize existing pipeline infrastructure to sustainably and affordably reduce emissions.
- NEHPBA is concerned on multiple levels about the emphasis on electric heat through heat pumps. Currently, in the Commonwealth of Massachusetts 50.6% of homes (1.3 million individual households) heat with natural gas; and 27% (700,000+ households) heat with oil. Allowing homeowners energy choice and diversity is important in the Northeast where power outages as a result of winter weather are very common. Heat pumps lose efficiency once temperatures dip below 40 degrees and are no longer the most efficient heating option once temperatures fall to 25 to 30 degrees. NEHPBA is opposed to changes in the stretch energy code that would eliminate certain choice of fuels, leading to increase costs of residential development.
- We urge DOER to create a formal advisory group or a group of stakeholders to assist with creating this code, doing this brings together professional members from the energy sector with a common goal of creating a fair and effective code.



Hearth, Patio & Barbecue Association Affiliate



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Climate goals can be achieved in an integrated and measured way that does not leave small business behind. NEHPBA looks forward to seeing how this proposal will be used by the utilities to ensure a capital plan that serves the residents and businesses who call Massachusetts home.

Thank you for considering our comments. Please do not hesitate to contact me with any questions.

Sincerely,

Karen Arpino  
Executive Director  
Northeast HPBA



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