



February XX, 2022

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

Re: REQUEST FOR COMMENT ON STRETCH CODE STRAW PROPOSAL

Dear Ms. Mascarenhas:

The Berkshire Regional Planning Commission (BRPC) is pleased to submit comments on the Stretch Code Straw Proposal presented by The Massachusetts Department of Energy Resources (DOER). BRPC appreciates DOER's efforts to improve upon the existing stretch code and further decarbonize the building sector. Buildings built in the next 10 years will make up a substantial portion of the building stock in 2050, so it is important to act swiftly and aggressively if we are going to meet the GHG reduction goals of the Massachusetts 2050 Decarbonization Roadmap. BRPC offers the following comments on the Stretch Code Straw Proposal:

Fossil Fuels

An update to the stretch code and introduction of a specialized code should more carefully consider the lifecycle of buildings and infrastructure and set the stage for what must become ubiquitous well before 2050: the widespread electrification of buildings and the elimination of fossil fuel reliance. Permitting fossil fuel hookups in the updated stretch and specialized opt-in codes ensures that natural gas infrastructure will continue to be built over the coming decades and remain in place in 2050. Realistically, this infrastructure will need to be decommissioned well before 2050 and the end of its useful life to meet 2050 GHG reduction targets. Allowing new fossil fuel-heated construction now needlessly locks us into a future of fossil fuel reliance and jeopardizes the State's climate targets.

At the very least, the specialized opt-in code should eliminate the accommodation of gas-heated buildings. As it was presented, the flexibility of net zero compliance through different pathways is helpful and requiring solar where feasible and wiring for future electrification is certainly moving in the right direction, but does not go far enough. Total building electrification under the specialized opt-in code is a no-regrets strategy to allow interested communities to more easily ban fossil-fuel use in new construction while retaining the option to rescind the code at any time.

HERS Rating Requirements

BRPC appreciates the inclusion of more stringent HERS rating requirements into the updated stretch and specialized opt-in codes for both gas-heated and electric buildings. However, given the State's GHG reduction targets for 2030 and 2050 and the fact that the average Massachusetts home was built with a HERS rating of 51 in 2020, both codes should reduce the HERS ratings caps even further, especially for gas-heated homes. There is not enough difference between HERS 42 for electric and 45 for gas-heated ratings, although enhanced requirements for gas-heated under the

specialized opt-in are beneficial. Gas-heated homes should no longer be comparably cost-effective to electric and developers must be reliably deterred from building them.

Definition of Net Zero

While upgrading the grid to become net zero is critical, the specialized opt-in code should not rely on the grid to become net zero rather than require homes to be. The timeline for achieving a net zero grid is undetermined and unreliable. Requiring buildings to be net zero themselves under the specialized opt-in code will likely mean decades of GHG reductions that will not be achieved by waiting on the grid.

Not requiring onsite or offsite renewables is another missed opportunity to meet the State's short-term GHG reduction targets and to make buildings and entire neighborhoods across the state more resilient to power outages (which are already increasing due to climate change).

These comments were approved by the BRPC Commission at its meeting on February XX, 2022.

Sincerely,

Thomas Matuszko, AICP
Executive Director