



March 1, 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**

Continuing to allow and incentivize fossil fuel heated new construction is incongruous with the State's climate targets and jeopardizes our ability to meet them by 2030 and 2050. BRPC is fully supportive of these goals and recognizes the need to electrify our building stock, new and existing, as soon as possible. Unfortunately, in Berkshire County (like many other rural parts of the state) the electrical grid and existing technologies that enable building electrification and energy storage are not reliable or cost effective enough to justify a total shift away from fossil-fuels, especially for low-and-middle-income families.

The specialized opt-in code should be ambitious and set the stage for what must become ubiquitous statewide well before 2050: the widespread electrification of buildings and the elimination of fossil fuel reliance. Allowing communities the option to ban fossil fuel hookups in new construction will drive market change that will make it possible for other communities to follow suit more quickly and eventually make it unrealistic for anyone to keep building fossil fuel-heated buildings. This would be 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. Without a more forward-looking option now, we will be locked into a future of fossil fuel reliance.

### **Workforce**

Making sure that the updated stretch and municipal opt-in codes align more closely with the Commonwealth's 2050 net zero goals in the ways mentioned above must be accompanied by a significant workforce development push by DOER. Currently in Berkshire County there is a shortage of contractors that can install and maintain heat pumps and provide weatherization and insulation upgrades. This is compounded by the fact that training current and future HVAC technicians on heat pump technology has stalled over the last two years due to the pandemic, yet new, updated equipment has continued to be released. This has widened the discrepancy between the demand for

HVAC electrification (as well as the requirements to fulfill the State's electrification goals) and what is feasible given the skills and availability of the current workforce.

The State could address this issue through a two-pronged approach of streamlining licensing procedures to better encourage people to enter the trades and expand training for them and current technicians on how to install and maintain heat pumps. Free or low-cost, easily accessible (potentially virtual) training programs available through the State will make it easier for technicians across the State, especially in more rural areas, to become proficient in heat pump maintenance. Increasing the availability of HVAC contractors working on heat pumps will give more municipalities the ability and confidence to adopt the specialized opt-in code.

### **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.

The analysis conducted by DOER demonstrates significant construction and operational cost savings for electric HERS 42 homes. The stretch and municipal opt-in code should require electric homes to meet these requirements and maximize GHG reduction potential while continuing to incentivize this option to ensure that it remains cost effective. While this analysis shows a slight cost increase for gas-heated HERS 42 homes, this requirement should be stricter. A 27% decrease in GHG emissions between the base code requirements (gas-heated HERS 52) and proposed stretch code requirements (gas-heated HERS 42) in 2032 is not enough to meet the State's GHG reduction targets if a substantial percentage of new construction continues to be gas-heated over the next 10 years. 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 be forfeited 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 Executive Committee at its meeting on March 3, 2022.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas Matuszko".

Thomas Matuszko, AICP  
Executive Director