

EEAC 2019-2021 Three Year Plan 'Last Call' Comments

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Comments by Michael Duclos

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Thank you for the opportunity to offer comments on the three year plan, I understand this is the last opportunity to submit written comments.

In the proposed plan, I find this text:

“Sustaining very high claimable savings goals becomes increasingly difficult in each subsequent years markets become saturated, “easy” savings no longer exist, and rising baselines continue to reduce claimable savings opportunities. Over the next three years, the Program Administrators will need to find ways to mine savings from more difficult, costly and challenging projects and market segments.”

I'd submit that those of us locally who have been designing, constructing, verifying, certifying and monitoring the energy use of Passive House homes have delivered large energy savings using the Passive House technology we have been practicing and refining since 2010. You don't need three more years to find ways to 'mine savings' – Passive House technology is available now, we know how to use it, and it works.

I see two key issues to be addressed:

1. Tools to deliver deeper savings do not include 'business as usual' energy simulators such as REM/Rate and other simulators that are currently used, because they do not accurately model deeper energy reductions, and are not used as part of a physics based, peer reviewed, comprehensive design and verification protocol to deliver deeper energy savings. For deeper savings, much more refined tools, techniques and a fundamentally different approach using trained and experienced practitioners is needed – I see the 'business as usual' incremental approaches have run to their conclusions, there is little more to be gained from that approach.
2. We need a catalyst to attract architects, engineers, developers and builders to invest the time and effort needed to learn how to use, and to choose, Passive House technology. This means providing meaningful incentives to deliver certified Passive House homes, such as the \$3500 per unit incentives provided by NYSERDA. We should also facilitate formal training in Passive House technology, for which some funding - again, look to NYSERDA as an example – would accelerate learning how to design, construct and certify Passive House buildings.

Finally, I believe the local practitioners of Passive House technology, including many members of Passive House Massachusetts who have been designing, building, verifying and certifying Passive House homes since 2010, stand ready to help with Massachusetts' transition to Passive House buildings that deliver deeper savings, and so are compatible with the goals of the Massachusetts Global Warming Solutions Act.

Thank you for the opportunity to provide comment, please do not hesitate to contact me if there are any questions.

Best Regards, Michael Duclos

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