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RE: Passive House Incentive Program for 3 Year Plan

As an architect with a strong understanding of the enormous energy saving potential of Passive House building design and a member of the Board of Passive House MA (PHMA), I wanted to personally follow up on our written submission of July 31, 2018 as we understand that the next Draft Plan is due out soon and the Final Plan is due out in early October. I believe it is critical that in addition to the commitment to training funding that has been requested, the Final Plan should include a meaningful incentive program for certified multifamily passive house projects. The time is truly now – we can already design and build radically low-load buildings, reducing energy use and green house gas emissions. We just need to move the market and your 3-year plan could truly make the difference. It would be extremely disappointing if this opportunity was missed and we had to wait for the next 3 Year Plan to implement such a program.

Assuming that residential projects are going to remain within the MassSave Residential, we would recommend that those programs be modified to include up front incentive payments like those provided by C&I Whole Buildings Solutions, Integrated Design Path Programs for Energy Charrettes and Design Team incentives. In addition, we recommend that these programs include a specific Comprehensive Custom Measures category for certified Passive House projects based not only on the recognition that they will provide deep energy savings, but the they include multiple and significant Non Energy Benefits (NEBs) including:

- Affordability – energy bills are a significant expense for low-income families
- Health – the continuous fresh air supply, either through an ERV or an HRV, required by PH, assures indoor air quality is better
- Comfort – noise reduction and thermal comfort by eliminating radiant cooling off of walls and windows
- Resiliency – In the event of a power outage, residents can shelter-in-place, avoiding the upheaval and/or expense of relocating

- Durability – PH design is focused on the building science of envelope construction – getting the air sealing and thermal bridge detailing right are critical to insuring that these buildings are durable.
- Reduced complexity and maintenance of HVAC equipment – ASHPs are a proven technology with a long term record of reliability
- Carbon Reduction – the low loads of PH and the tendency for these buildings to go to mostly or all electric reduces carbon production and thereby helps the State meet its long term carbon reduction goals

We think it is reasonable to quantify this incentive for Passive House certification at \$3500/ unit like the NYSERDA Program has done in New York.

We urge you to seriously consider these recommendations.

Thank you so much,



Michelle Apigian, AIA, LEED AP, AICP, CPHC
Associate
PHMA Board Member

