

Memo

1/15/2021

To: Mass EEAC

From: Hank Keating, AIA, President, Passive House Massachusetts

EEAC Three-Year Plan 2022-2024

RE: New Passive House Incentive Program for 1-4 units

On 12/8/20 we submitted the outline of a proposed Passive House Incentive Plan for 1-4 Units (PHIP 1-4). We pointed out that annually approximately 42% of the building permits issued are for buildings of this size. We suggested that the PHIP 1-4 could mirror the existing PHIP for 5 units plus except that we believe that the incentive amounts must be increased.

We pointed out that the proposed increases might well fail the typical cost-effectiveness calculations that the EEAC and Mass Save typically use. We also pointed out that the Climate Bill, S-2500 at the time, specifically changed this equation by stating that “..provided however that when determining cost effectiveness, the calculation of benefits shall include calculations of the social value of greenhouse emissions reductions.” This language is contained in the current Climate Bill s 2995 that the Governor pocket vetoed last night so it did make it into law, but the intent is clear.

In addition, in the newly issued 2030 Interim Clean Energy and Climate Plan, Strategy B2 states “In order to better align Mass Save with the state’s GHG emissions reduction targets and requirements, DOER will work with the Commonwealth’s Energy Efficiency Advisory Council(EEAC) and Mass save program administrators with the goal of ensuring that the cost of long-term GWSA compliance is included in all program cost-benefit calculations...” The intent is clear.

We urge the EEAC to include in their final recommendations an adequately funded PHIP for 1-4 units for the 2022-2024 Three-Year Plan.