

Memo

1/15/2021

To: Mass EEAC

From: Hank Keating, AIA, President Passive House Massachusetts

EEAC Three-Year Plan 2022-2024

RE: Passive House Retrofit Programs

On 12/8/20 we submitted two proposed Passive House Retrofit Incentive Programs ( PHRIP ), one for 1-4 units and one for 5 units +. We also supported, along with numerous non-profit affordable housing organizations, the proposal submitted by the Winn Companies to dramatically revise the LEAN program to accommodate deep energy retrofits for affordable housing. We see the PHRIP's as complementary to the LEAN deep energy retrofit program in that existing market rate buildings will qualify where they cannot for the LEAN program.

We pointed out that Passive House retrofits are very challenging, but the certification process brings with it confidence that the results will be durable, healthy and resilient. We also pointed out that for both the LEAN program and the PHRIPs, the typical cost-effectiveness calculations the EEAC and Mass Save apply to proposed programs will not work. We mentioned 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.

In addition, Strategy B2 calls for the deep energy retrofit of 20% of the existing building stock, or 400,000 of the estimated 2 million existing buildings and the "Thermal Electrification" of approximately one million households which will require deep energy retrofits. Taken together, the amount of deep energy retrofiting that the 2030 CECP calls for is massive. It will not be possible without Mass Save retrofit programs to bring about market transformation. Our industries will get better and better at retrofits, but at this point in time, significant incentives will be required to get the industry engaged and learning.

We urge the EEAC to include deep energy retrofit programs including LEAN and Passive House in the final program recommendations.