

Memo

1/15/21

To: Mass EEAC

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

EEAC Three-Year Plan, 2022-2024 Testimony

Re: Passive House Incentive Plan

On 10/13/20 we submitted testimony to the EEAC suggesting that the existing Mass Save Passive House Incentive Program (PHIP) be extended into the 2022-2024 Three-Year Plan. Since we submitted this suggestion the Interim Clean Energy and Climate Plan for 2030 has been issued. The 2030 CECP predicts that by 2030 Massachusetts will add “approximately one billion square feet of additional building space”. CECP Strategy B1 stresses that these new buildings must be governed by a “new, high performance stretch code requiring passive-house level building envelope efficiency starting in 2022”. Further, it requires DOER to work with Mass Save to “align incentives with a high-performance building code including incentives for Passive House construction”. With or without the new high-performance code, continuing the Mass Save PHIP in the 2022 – 2024 Three-Year Plan will be a significant force moving the market toward the CECP goals.

In our October submission, we made one suggestion regarding the transparency of information about the projects enrolled in the PHIP. In October, we understood from Mass Save that over 4000 units had enrolled in the program, now we understand that the number is over 6000. Fantastic results considering that we are only 2 years into the Three-Year Plan. But these numbers point to the transparency issue we are raising. We all need to know as much about these projects as possible to make accurate judgements about how the program is working and the actual energy saved, and carbon emissions reduced. We understand that Mass Save has some over-arching privacy guidelines that make it difficult to display project information transparently. We believe such transparency ought to be a PHIP requirement that participants agree to as a condition of enrollment. We do not believe that there will be many, if any, potential participants that will balk at such a program requirement.

Given the alignment of the PHIP with the 2030 CECP goals, we strongly encourage its continuation in the 2022-2024 Three-Year Plan.