



MASSACHUSETTS ASSOCIATION OF REALTORS®

January 23, 2015

Christina Halfpenny, Chair
Massachusetts Energy Efficiency Advisory Council
100 Cambridge Street
Boston, MA 02114
VIA EMAIL

RE: Three Year Energy Efficiency Plan

Dear Chair Halfpenny:

Thank you for the opportunity to provide comments to the Department of Energy Resource and to the Energy Efficiency Council as we move toward a new, three-year energy efficiency plan for 2016-2018. REALTORS® applaud DOER and the Council for the tremendous efforts and the results, making Massachusetts a more energy efficient place to live and work. The American Council for Energy Efficient-Economy has recognized this work by rating Massachusetts the most efficient state in the Nation, four years in a row. Our members, who live and work in every community across the state, support sound environmental policy and believe that protecting our environment is a priority.

The Massachusetts Association of REALTORS® (MAR) would welcome the opportunity to promote energy efficiency practices among homeowners and renters throughout the Commonwealth. MAR has long supported a property owner's ability to obtain an energy inspection of their home through voluntary programs such as MassSave. MAR also supports a homebuyer or prospective tenant's ability to inspect a property for energy efficiency before purchase or occupancy.

However, we oppose any attempt by government to obligate homeowners to obtain an energy evaluation or receive an energy score either as a general requirement for homeownership or in connection with, or as a part of, their right to freely transfer property at the time of their choosing. We strongly believe that mandatory energy auditing of homes should only be done with prior informed consent by the homeowner.

There is no real data on the current energy efficiency condition of Massachusetts' housing stock. However, according to census data 75% of our homes were built before 1980 and many of those are located in less affluent communities, such as the gateway cities, where homeowners are already struggling financially. These areas will be hardest hit by a policy requiring home energy auditing and scoring, for they contain some of the oldest housing stock. These older and historic homes of Massachusetts typically may not be as energy efficient. As such, these ratings also could cause a stigmatization of these homes, representing significant burden to homeowners.

Thank you for taking the time to consider our concerns and we look forward to working with DOER, the Council, and the Program Administrators to ensure the most effective ways to promote awareness and action by homeowners.

Sincerely,

Corinne Fitzgerald,
President

Robert Authier,
CEO/EVP

