

July 14, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114



Comments submitted by email to: ma-eeac@mass.gov

Dear Commissioner Woodcock and Members of the Massachusetts Energy Efficiency Advisory Council:

Thank you for the opportunity to provide comments to you about the need for a deep energy retrofit program through Mass Save as the EEAC continues to receive public comment about the 2022-2024 Draft Energy Plan.

Supporting and conducting deep energy retrofits across a diverse multifamily housing sector is the single most important effort that Mass Save can undertake to set the stage for the work needed to retrofit tens of thousands of units across the Commonwealth over the next 10 to 20 years. A deep retrofit program is critical to the State's ability to meet the 50% reductions of greenhouse gas emissions legally required by the Next Generation Roadmap Bill by 2030.

Mass Save is a critical resource for affordable housing owners who lack the needed resources to do the scale and scope of deep energy retrofits needed.

A deep energy retrofit program could be built off the already successful Passive House New Construction program and target multifamily housing, including both 1-4 family and 5+ unit market rate, mixed income, and low-income communities. The goals of this Deep Energy Retrofit Market Transformation program (DER) would transform existing buildings into healthy, durable, comfortable, and energy efficient communities.

MCAN, in alignment with retrofit experts, suggests that the Deep Energy Retrofit Program include the following:

- Meet Passive House certification standards OR not exceed a site Energy Use Intensity (EUI) of 30 kBtu/ft²/year and an air tightness of 2.0 ACH50 (air changes per hour at 50 pascals)
- Use heat pump-based technology for space heating and cooling;
- Use energy or heat recovery ventilation technology;
- Fully electrify domestic hot water systems;
- Include serious consideration of material decisions related to embodied carbon.

Incentivizing early adopters is critical, especially for identifying replicable solutions that can scale up easily, drive costs down and promote wider market adoption. Collaboration with affordable housing developers and housing finance agencies is also critical for identifying and enrolling projects at the point of refinancing, ensuring timing of the utility incentive commitments align with housing finance agency awards.

Lastly, there must be protections in place for renters to avoid the undesired potential of facing higher rents once the retrofit is completed. MCAN recommends that participating in the DER program requires landlords to lock in rents for no more than 7 years. Tenant protections are a specific form of climate justice and are urgently needed in our pathway to decarbonize. Greening up does not always have to mean pricing out low-income renters.

Thank you for your consideration of MCAN's recommendations.

Sincerely,

A handwritten signature in black ink that reads "Sarah E Dooling". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sarah E Dooling, Executive Director