

Memo

10/13/20

To: Mass EEAC

From Hank Keating, AIA, President, Passive House Massachusetts

EEAC Three-Year Plan 2022-2024 Testimony

RE: Passive House Incentive Program

The current Three- Year Plan includes a very promising Passive House Incentive Program (PHIP). Over 40 multifamily projects including 4000+/- units have registered for the program and are in various stages of planning and development. We understand that not all projects will proceed with passive house after completing the required Feasibility Study, but if only 50% do the program will be a tremendous success. We believe that many of those projects that do not proceed with passive house will nevertheless produce substantially more energy efficient projects than they would have before completing the Feasibility Study. We also know that the PHIP, along with its accompanying training programs, is truly getting the word out to the design, development and construction communities that passive house is starting to go mainstream and they should seriously consider it.

Large multifamily projects have long design, development, financing, construction and occupancy schedules. This means that evaluating the final results of the current PHIP projects will not be possible for another 12 – 36 months. We believe that this means that the next Three-Year Plan ought to build on the success of the current PHIP by replicating it. We think it is working well and does not require any significant revisions.

The one suggestion we have is to revise the enrollment requirements to include the applicant's release of project data. The entire industry needs the data to evaluate the program. Why can't the applicants, in exchange for the incentive funding, be required to be transparent and provide a basic project description, the results of their Feasibility Study, the basis of their decision to proceed or not with a passive house project, projected cost premiums if any, suggestions to improve the program if any, etc. Ideally, applicants would be encouraged to communicate with each other, to learn from each other's experiences. We understand that the Mass Save Program has some over-arching privacy rules regarding applicant's information. These rules should not deprive the public, the rate payers, from getting transparent information regarding these PHIP projects. We doubt that very many applicants would hesitate to release project data in exchange for the incentive funding.

We applaud the EEAC's decision to create the PHIP for the current Three-Year Plan and we strongly encourage its continuation in the next Three-Year Plan.