



Ruthanne Fuller
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Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
ma-eeac@mass.gov

Re: Deep Energy Retrofit Market Transformation Program in the Massachusetts Joint Statewide Electric and Gas Three-Year Energy Efficiency Plan

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

Here in Newton, we have adopted a Climate Action Plan with the goal of achieving carbon neutrality by 2050. In light of the fact that in this City over 60% of greenhouse gas emissions come from homes, apartments, and commercial buildings, we know that our goal is unattainable without a significant investment in retrofitting existing buildings. This is the most challenging aspect of the Plan, and one for which we need the State's assistance, mostly importantly in the form of incentive programs.

Therefore, I urge the Energy Efficiency Advisory Council to build on the success of the Mass Save Passive House New Construction Program through the creation of a new Deep Energy Retrofit Market Transformation Program for existing buildings. Mass Save has a critical role to play in decarbonizing the buildings sector by incentivizing retrofits that lead to lower costs and cleaner, healthier, and more comfortable homes for the State's residents.

Thanks to the successful Mass Save Passive House New Construction Program, the multifamily housing sector has taken significant steps toward high-performance, low-carbon new construction projects. The Passive House Incentive Program has propelled many hundreds of housing units toward superior energy savings. While tremendous progress has been made to reduce emissions from new construction projects, deep energy retrofits in existing buildings remain a serious challenge for a wide variety of reasons. In the absence of robust incentive programs, many owners of existing buildings will be unable to make the type of low-carbon investments needed for the State to achieve its decarbonization goals. To complement the successful Passive House Incentive Program for new construction, **we urge your consideration of a new, ambitious retrofit program for existing single-family and multi-family housing, including 1 to 4-family and 5+ unit market-rate, mixed-income, and low-income residences.**

The City of Newton recommends that the Deep Energy Retrofit Market Transformation Program include Passive House standards; heat pump technology for space heating, cooling, and hot water; and heat recovery ventilation technology; and require serious consideration of material decisions related to embodied carbon. We also urge close collaboration with affordable housing developers and housing finance agencies.

Further, the City of Newton asks the EEAC to consider the whole value of Deep Energy Retrofit projects in cost-effectiveness screening. As you well know, the Commonwealth's recent climate legislation, *An Act Creating a Next*

Generation Roadmap for Massachusetts Climate Policy, requires: “[W]hen determining cost-effectiveness, the calculation of program benefits shall include calculations of the social value of greenhouse gas emissions reductions.”

The City of Newton recommends additional updates to the relevant cost-effectiveness calculations, such as the DPU’s requirement that where programs are not cost-effective from the outset, they have a plan to reach cost-effectiveness; consideration of the health impacts of retrofits; and consideration of the full useful life of eligible measures.

Kickstarting deep energy retrofits across the diverse multi-family 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. In short, it is critical to the State’s ability to meet the greenhouse gas emissions requirements of the State’s new climate legislation.

Please reach out me if you have any questions.

Sincerely,



Mayor Ruthanne Fuller