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Subject of Comment

The Massachusetts 2025-2027 Energy Efficiency and Decarbonization Plan

I would like to speak during public comments at the next EEAC Meeting

- No

Write Comments Below

Steven Winter Associates strongly supports the incorporation of Embodied Carbon in Mass Save Incentives for both residential and commercial buildings. We believe this will help move the industry forward to include low carbon materials and incentivize building reuse.

However, we are concerned about the misalignment with the Mass Stretch Code proposed updates, the Mass Save incentives, and other active and proposed policies.

Mass Stretch Code updates for the HERS pathway in residential construction are proposing a 3-point HERS score embodied carbon credit for either achieving 70% better than the Eastern Region NRMCA average for at least 90% of all concrete used in a unit OR having the global warming potential of all insulation in the unit being less than 0 according to BEAM default values. We strongly support the whole building Life Cycle Analysis over focusing on insulation and concrete only.

We encourage Mass Save to lead the way and use an industry recognized material baseline values like published by the Carbon Leadership Forum or LEED. Doing that will streamline project work, harmonize code compliance and align with other programs and incentives.

We support the proposed \$0.06/kgCO₂e incentive which covers roughly half the labor cost of doing a whole-building LCA based on an assessment using a sample project in Newton, MA.

Achieving 75% structure and enclosure reuse likely favors masonry and concrete structures. We suggest a 50% reuse target because replacing enclosures often adds operational energy efficiency and projects doing facade replacements will have a challenging time achieving the 75% reuse target.

We also suggest adding clarity to the proposed language around:

Reference the LCA methodology and data quality standards per LEED

Clarify the included building elements, life cycle stages, and impact categories

We are excited to see the results of the 100-home study, but we advise against using the study to create a baseline for just Massachusetts and recommend aligning with LEED and CLF baselines to be able to compare the embodied carbon reductions across state lines.

Steven Winter Associates strongly supports the commercial Mass Save incentives approach that aligns with the proposed LEED v5 (inclusion of board and foam insulation) and the GSA Federal Buy Clean Initiative (concrete, steel, flat glass, gypsum board). This alignment will streamline work for the project team and incentivize the completion of an LCA with industry wide accepted methods and baselines. The incentives for Multifamily

building 5+ units should align with the commercial incentive outline for method and baselines.