



NORTHEAST HOME ENERGY RATING SYSTEM ALLIANCE

April 3, 2024

Department of Energy Resources
c/o Ian Finlayson, Deputy Director, Energy Efficiency Division
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Mr. Finlayson:

These comments are submitted on behalf of the Northeast Home Energy Rating System Alliance (NEHERS)'s Embodied Carbon Committee. The NEHERS Alliance was formed in 1998 to foster, unify and promote HERS Industry in the Northeast, including the following states: CT, MA, ME, NH, NJ, NY, OH, PA, RI and VT. We represent 9 providers, over 250 rater members, plus over 50 RFI, Modeler, and HERS Rater candidates in training. The Energy Codes Committee is responsible for reviewing the Residential Energy Code with respect to HERS Raters concerns and taking actions where appropriate to attempt to improve the clarity and implementation of the Residential Energy Code.

We applaud Massachusetts' efforts to create an energy code that is ambitious and designed to meet the state's climate goals.

The demand for HERS Raters across the commonwealth is significant, and we want to make sure that there are adequate resources available to support the industry as we prepare for a significant increase in stringency for new construction on July 1, 2024 when the HERS index drops to a 42. HERS Raters are available to track Materials Embodied Carbon as evidenced by the new RESNET/ANSI/ICC Standard 1550 for Materials Embodied Carbon

To that end, we are recommending an Embodied Carbon adder, similar to the Clean Energy Table for Adjustments used in previous Stretch Codes

MAXIMUM ENERGY RATING INDEX

On-site Renewable Energy Application	Maximum HERS Index Score^{a, b}	
	New Construction	Whole House Renovations; Additions
None	55	65
Solar Electric Generation	60	70
Clean Space Heating	60	70
DHW	57	67
Solar Electric and Clean Space Heating	65	75
Solar Electric and DWH	62	72
Solar Electric, Clean Space Heating and DHW	67	77

The Embodied Carbon HERS adder can be presented in at least 2 ways

- 1) A Performance Path
 - a. 1 HERS point per xxx kilograms/sq ft of Materials CO2 reduction” up to 5 HERS points
 - i. Reference the MASS CEC 100-Home Study (or previous Builders for Climate Action studies) as a possible benchmark to target Embodied Carbon improvement in the performance path?
 - ii. Possibly use the MASS CEC study to create a Baseline home
 - b. Use HERS Raters and the developed Ekotrope to BEAM integration tool or Other software as Embodied Carbon data points
- 2) A Prescriptive Path - with concrete insulation glass etc. as categories to show improvement over the industry standards – up to 5 HERS points
 - a. 3 points for low carbon concrete (with EPD support)
 - b. 2 points for low carbon insulation
 - c. 1 point each for additional categories

We recognize there is a huge opportunity for existing homes to leverage embodied carbon as well, and Embodied Carbon HERS credit would make HERS 55/52 for existing buildings approachable in many ways.

The Northeast HERS Alliance appreciates the opportunity for public comment, and we encourage the DOER to reach out to us with any questions or concerns,

Thank You!

NEHERS Embodied Carbon Committee