NEHERS
NORTHEAST HOME ENERGY RATING SYSTEM ALLIANCE

PO Box 808
Northampton, MA 01061

9/17/24

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 Energy Code Committee and Embodied Carbon Committee. The NEHERS Alliance was formed in 1998 to foster, unify and promote HERS programs in the Northeast and we represent over 250 rater members, plus over 125 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. The Embodied Carbon Committee is leading an initiative to propose a new RESNET Standard on Embodied Carbon and will be conducting a 100-Home Embodied Carbon Study on new construction in MA this fall.

We applaud Massachusetts' efforts to create an energy code that is ambitious and designed to meet the state's climate goals and appreciate the commonwealth's interest in addressing Embodied Carbon.

Although we do support the overall goal of addressing embodied carbon, our members have expressed questions and concerns around the specific requirements which we have outlined below.

- Is this credit available for multi-family housing development projects with multiple dwelling units that have a shared thermal boundary? If so, how would the credit be allocated? Would each unit receive the 3-points?
- We also request clarification on how to calculate the GWP in situations where two insulation types are used in one cavity-such as flash and batt, or possibly 3 inches of closed cell spray foam plus cellulose? It isn't explicitly described how this would be addressed in the code and clarification would be helpful for the HERS Rater community.
- There are a couple of errors we noticed as well to be addressed. In Section R406.5.2 (1) the table number referenced is Table R406.5.2, however the default values are in Table R406.5.3. Additionally, Item 4 of section R406.5.3 does not have an "R" before the reference to "Table 406.5.3".

We support DOER's recommendation to adjust the stringency of the requirements for large existing building additions and alterations. As we had noted in previous comments in April, "*a HERS 52 is difficult to achieve in an existing building because the air leakage of unaltered portions of the building remains high, and a whole home blower door test is going to include both new and existing portions of the thermal envelope. Rating the whole home will also factor in equipment that may not be replaced, which can also negatively impact the energy model."* By adjusting the limits for additions and alterations to HERS 65, 70, or 75 to align with the base code, the requirements will become easier to enforce and less burdensome to our clients and the larger building community.

These public comments are intended to express a snapshot of the biggest concerns of the HERS industry about the updates to the Stretch Code and Municipal Opt-In Specialized Code, and we encourage our members to submit their own additional comments for clarification.

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!

Betsy L. Ames

Betsy L. Ames
Executive Director
On behalf of the NEHERS Energy Code Committee and NEHERS Embodied Carbon Committee