



March 28, 2014

Mark Sylvia, Commissioner
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: MA Stretch Energy Code Update

Dear Commissioner Sylvia:

On behalf of the City of Cambridge, I am submitting comments regarding updating of the Massachusetts Stretch Energy Code. Cambridge was an early adopter of the Stretch Energy Code. We believe it has contributed to making our building stock more energy efficient.

Given that the base energy code is moving to IECC 2012, which will make the base code approximately equivalent to the Stretch Energy Code, we believe the Commonwealth should update the Stretch Energy Code to continue providing a "stretch" option. We believe that new construction should be able to achieve an additional 10 to 20 percent improvement.

While the Stretch Energy Code has been a positive force in our sustainability efforts, it has been problematic in regard to on-site co-generation systems and district energy. This is due to the site energy basis of the code. The City urges the Commonwealth to develop a source energy approach that would support the deployment of on-site co-generation and use of district energy and recognize the greenhouse gas emissions reduction benefits of these. We believe the ability to deploy more co-generation and district energy solutions is critical to moving toward lower carbon intensity and in the direction of net zero emissions. There is already a significant amount of on-site co-generation in Cambridge and interest among developers in this technology. We also have a district steam system in East Cambridge, as well as campus steam systems at the universities.

In regard to the commercial portion of the Stretch Energy Code, it would be desirable to have a means to verify that commercial buildings are constructed in accordance with the energy modeling. An advantage in the residential portion of the code is the incorporation of the HERS rating and employment of third party raters. There is no analog on the commercial side. We don't have a specific suggestion in this regard, but it would help to have some type of verification to ensure that commercial buildings achieve high energy performance.

The City sees the Stretch Energy Code as a fundamentally important policy tool for the advancement of our climate change and energy goals. Energy use in buildings is our largest source of greenhouse gas emissions. Since municipalities in Massachusetts do not have the option to establish our own energy codes, we rely on the Commonwealth to provide effective energy codes that will contribute to making communities more sustainable.

Several sustainability and climate change initiatives have been launched in Cambridge for which the Stretch Energy Code is a key strategy.

Getting to Net Zero Task Force – This task force was launched in January to develop recommendations by the end of the year on how to move Cambridge toward net zero greenhouse emissions from the building sector.

Community Compact for a Sustainable Future – In May 2013, the City, MIT, and Harvard University developed a joint agreement that recognizes the crisis we face from climate change and committed to a collaboration to make Cambridge more sustainable and marshalling our intellectual and entrepreneurial resources to develop solutions that can be adopted broadly. The Compact has been joined by eight of our major employers and more are joining. The Compact is currently establishing an organizational structure, funding, and staff. Building energy use has been identified as a priority issue for the Compact along with sustainable transportation and climate change resilience.

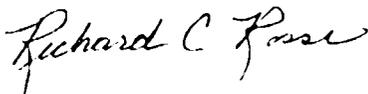
Kendall Square Ecodistrict – The City is working with MIT, the Kendall Square Association, and the Cambridge Redevelopment Authority to create an ecodistrict in the Kendall Square area where nearly half of our energy use occurs. The ecodistrict will focus much of its effort on addressing total energy use, energy use intensity, and carbon emissions from commercial, institutional, and large residential buildings.

Climate Change Preparedness - The City is currently conducting a climate change vulnerability assessment which will form the technical foundation for a climate change preparedness plan. Making our buildings more resilient to storm damage and extreme heat is a key focus. Energy efficiency is an important strategy to improve building resilience.

Building Energy Use Disclosure – The City is developing a building energy use reporting and disclosure ordinance for consideration by the City Council. This ordinance if enacted will provide a means to monitor building energy performance and will complement the energy code as well as the City’s green building zoning requirements.

We appreciate the opportunity to comment.

Very truly yours,



Richard C. Rossi
City Manager