

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF ENERGY RESOURCES  
*Patrick Woodcock, Commissioner*

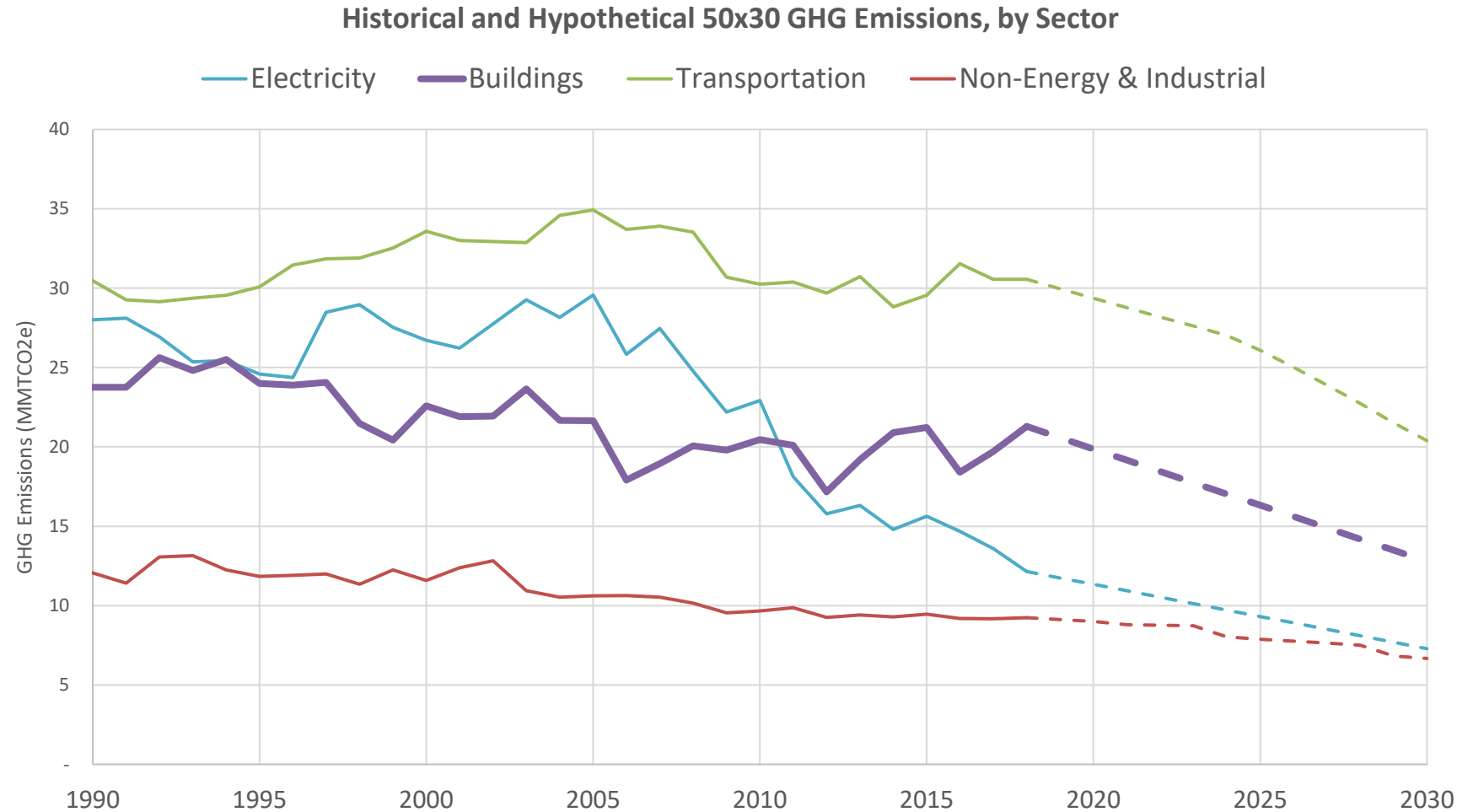
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# **Building Energy Code Straw Proposal: Q&A for A Better City**

March 2022

# Climate context: MA Emissions by Sector

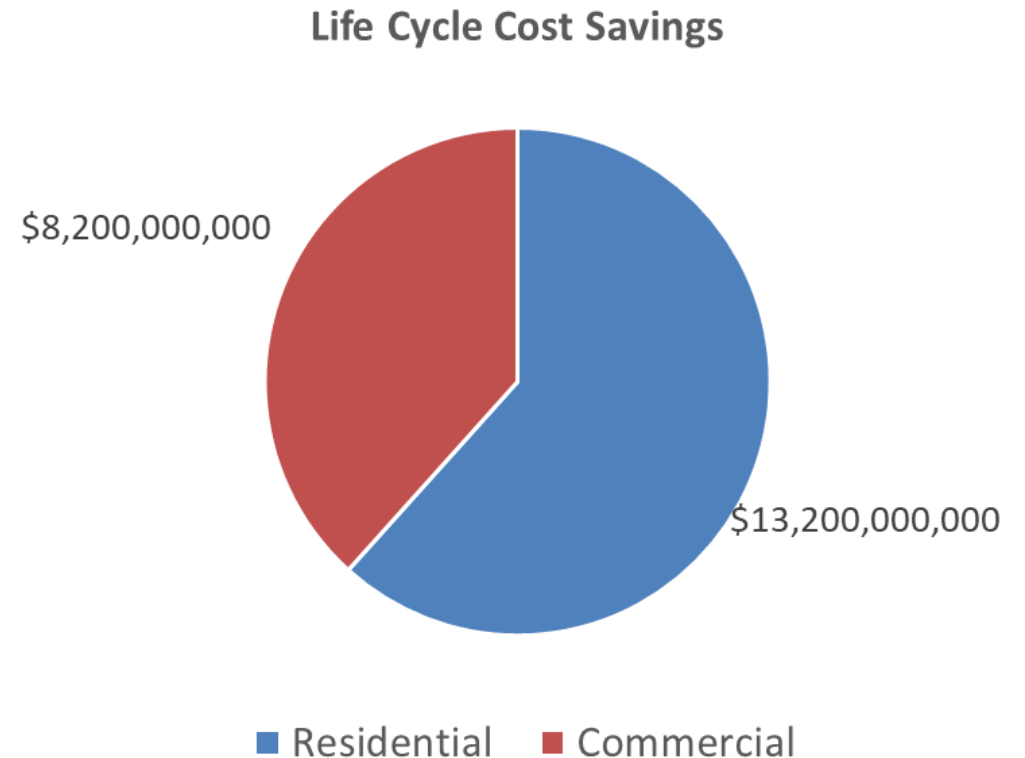
- **Historical:** Building sector emissions have made modest progress; electric sector has made most progress in decreasing emissions
- **Going forward:** Need reductions across all sectors by 2030 and beyond
- More than **50% of emissions reductions we need to cut by 2050** will come from personal vehicles and residential space heating



# DOER Straw Proposal – Economic and Emissions Impact

- **DOER is proposing two updates:**
  - Update Stretch Energy Code, align with timing of the base energy code update
  - Issue new Specialized Opt-in Code as required by 2021 Climate Roadmap legislation by Dec 2022
- **500,000\* tons/year** of GHG reductions in 2030,
  - rising to 694,000 tons/year by 2035
  - Other economic, health, resiliency and grid benefits
- **Over \$21 Billion** in life cycle cost savings (combined construction and operating costs)

\*Note: Emissions reduction and cost savings forecasts are conservative as they currently do not account for any solar PV additions to new construction or methane leakage from natural gas supply and use.



# Starting in 2023 – 3 Energy Code options:

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This straw proposal includes an update to the stretch code alongside the new specialized stretch option for Municipalities

## Base Code (10th Edition of MA Building Code)

- New Buildings in towns and cities that have not adopted a stretch code
- 52 communities
- BBRS update effective in 2023

## Stretch Code (Update)

- New Buildings in towns and cities that adopted, including all green communities
- 299 communities
- DOER update effective in 2023

## Specialized Opt-in (New Code Option)

- New Buildings in towns and cities that choose to opt-into this code
- Available for adoption Dec 2022

## Straw Proposal for Comment

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DOER is seeking comments on its Straw Proposal updating the Stretch Energy Code and Proposing the new, Specialized Stretch Energy Code.

DOER highly encourages written comments be submitted electronically to [stretchcode@mass.gov](mailto:stretchcode@mass.gov) with the subject line “Stretch Code Straw Proposal Comments”. Responses will be accepted until 5 pm on **March 9, 2022**. Written comments may also be submitted via mail to the Department of Energy Resources, 100 Cambridge Street, Suite 1020, Boston, Ma 02114, attention Nina Mascarenhas.

# ABC Questions

## Question

What additional opportunities will there be for comments beyond the first date (currently March 9<sup>th</sup>)?

# Expected Timeline for code adoption

	Winter 2022	Spring 2022	Summer 2022	Fall 2022	Winter/Spring 2023	Summer 2023 and beyond
<b>Updated Base Code</b>	Draft on BBRS 10 <sup>th</sup> edition code webpage		BBRS Public hearing on 10 <sup>th</sup> edition	BBRS vote on final 10 <sup>th</sup> edition	<b>Effective Jan. 2023</b> as part of 10th edition Code (MA IECC 2021)	
<b>Updated Stretch Code</b>	Outreach, public hearings, and comments on straw proposal	Draft code language available for public comment	Public hearings on draft code	Finalize code proposal & Publish Code	<b>Effective Jan. 2023</b> to align with 10 <sup>th</sup> edition	Phase-in HERS requirements in Dec 2023
<b>New Specialized Opt-in Code</b>	Outreach, public hearings, and comments on straw proposal	Draft code language available for public comment	Public hearings on draft code	Finalize code proposal & Publish Code	<b>Finalized Dec. 2022</b> - Municipal adoption begins	Likely effective dates - July 1, 2023, Jan 1, 2024

# ABC Questions

## Question

Can you describe the Targeted Performance Pathway and Relative Performance Pathway compliance processes in more detail? What will be required of developers?



# Proposed Stretch Code: Pathways

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## DOER PROPOSAL: Five Pathways for Code Compliance depending on building use type:

- Prescriptive Pathway (Small buildings <20,000 sf only)
- Targeted Performance Pathway (Required for Offices & Schools, Option for Multi-family)
- Relative Performance Pathway (High ventilation and other buildings)
- Passivehouse (Option for all building types)
- HERS (Option for Multi-family)

# Proposed Stretch Code: Current/Proposed

Pathway	Current	Proposed
Prescriptive	IECC 2018 (MA amended)	IECC 2021 plus MA <b>additional commercial requirements</b> : air tightness, windows, ventilation, thermal bridging
Targeted Performance	Not an option	TEDI – Thermal Energy Demand Intensity limits by building type and size for Schools, Offices and Option for Multi-family. <b>Add'l commercial requirements</b> re: air tightness and widows/walls
Relative Performance	2013 ASHRAE (mandatory over 100,000 sf)	2019 ASHRAE App G plus MA <b>additional commercial requirements</b> (air tightness, etc) allowed for a) complex, high ventilation buildings and b) buildings not required to follow TEDI
Passivehouse	Optional for all types	Optional for all types
HERS	Option for Multi-family (HERS 55)	Option for Multi-family (HERS 42/45) effective in Dec 2023

# Proposed Stretch Code: Add'l Requirements

	<b>Current Base &amp; Stretch</b>	<b>Updated Stretch &amp; Specialized</b>
<b>Envelope UA maximum</b>	Mandatory – all commercial buildings	Improved for buildings with regular walls and accommodation for curtainwall buildings
<b>Air infiltration</b>	0.4 cfm/sf at 75 Pa	0.25 cfm/sf at 75 Pa
<b>Ventilation Energy Recovery</b>	Many exceptions which allow no energy recovery, otherwise up to 50% effectiveness	Largely reduces exceptions, generally 80% effectiveness
<b>Electrification of space heating</b>	Optional	High ventilation buildings: Partial electrification mandatory, all other buildings: optional

## Proposed Stretch Code: Accommodation for Curtain wall

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- Envelope performance backstop
  - Will be somewhat strengthened from current code
  - However, for curtain wall construction – will maintain about current level to accommodate builder preference
- Additional requirements if using curtainwall - demonstrate embodied carbon reduction from a choice of options
  - Low carbon concrete
  - Carbon sequestering materials (e.g. wood fibre-board, mass timber)
  - Recycled materials (e.g. Foamglass)
  - Reused materials/building reuse



# ABC Questions

## Question

Will you share more detail on the “least-cost decarbonization” analysis conducted by SWA, BRA, Buro Happold, and Consigli?

- a. How was the TEDI limit developed?
- b. What data supported the cost analysis

What data was used in the large office and office/lab analysis to determine an achievable TEDI and associated cost impacts?

# 12 Building types for in-depth analysis

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- Small office
- Large office
- Office-lab
- Elementary school
- High school
- High rise multi-family tower
- 4 story multi-family
- Multi-family mid-rise podium
- 6-unit multi-family
- Townhouse
- Single family Small
- Single family Large





# Commercial Analysis Approach

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1

Identify representative projects for each building type, fuel source, glazing approach

2

Model base code and Passivehouse scenarios to bracket construction and energy costs

3

Iterate and stress-test designs with a focus on reducing heating loads (emissions) to find 'optimized' performance targets for code

4

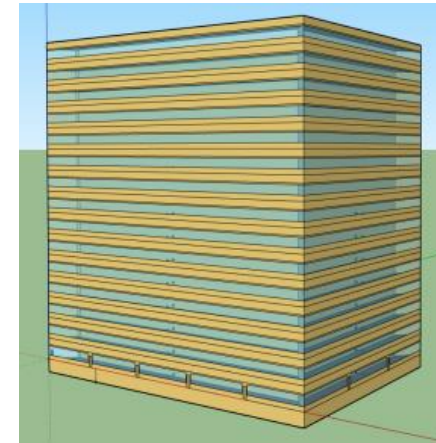
Detailed pricing of each building type leading to building case studies

# Baseline and improved scenarios

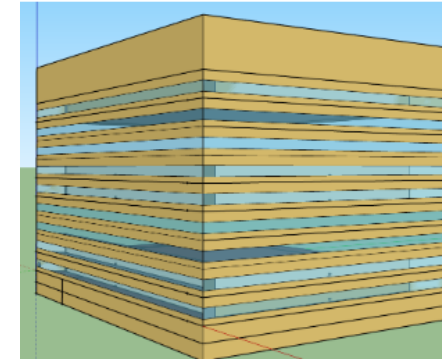
1

2

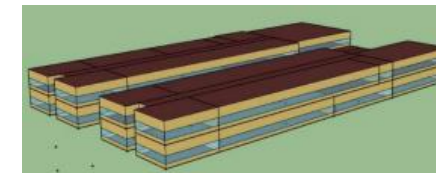
Category	Building Type	Small Office	Large Office	Office/Lab	Primary School	Secondary School
Baseline	IECC 2018	X			X	
	10% Stretch		X	X		X
Improved	Proposed - Gas Heat	X	X	X	X	X
	Proposed - Electric Heat	X	X	X	X	X
	Passive House - Gas Heat	X	X	X	X	X
	Passive House Electric Heat	X	X	X	X	X



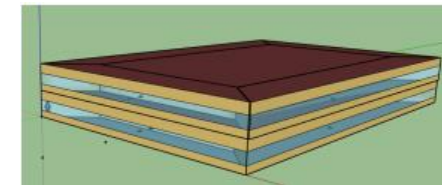
Large Office



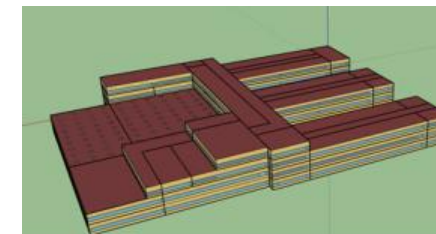
Lab-Office



Primary School



Small Office



Secondary School

Code baseline and improved models were developed, both gas heated and electric heated. Proposed models used strategy of optimizing envelope and heat recovery improvements to reduce heating thermal demands, reduce HVAC equipment, and improve ease of electrification.





## Improved envelope + heat recovery

**COST ADD**



- Reduced air infiltration
- Wall “R” values
- Window “U” values
- Ventilation heat recovery

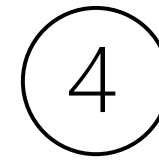
## Reduced HVAC

**COST DEDUCT**



- Less distribution systems
- Smaller equipment
- Less rooftop equipment

# Example of detailed cost report



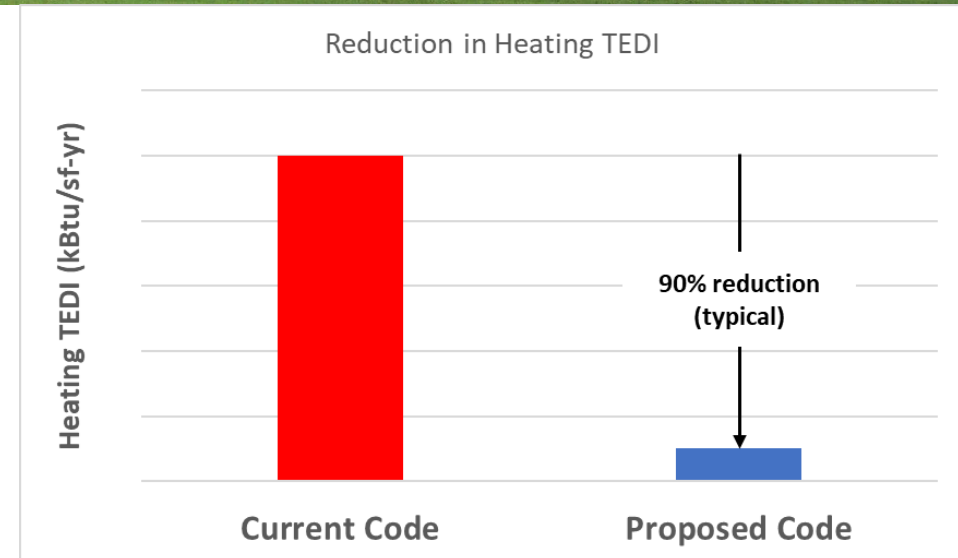
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June 11, 2021



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		Gas Heat		Gas Heat		Gas Heat		Electric Heat		Gas Heat		Electric Heat			
		Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	Total Cost 652,800 SF	
01-10	Testing	- \$	-	- \$	-	- \$	-	0.32 \$	210,840	0.32 \$	210,840	0.32 \$	210,840	0.32 \$	210,840
05-12	Structural Steel	- \$	-	- \$	-	- \$	-	0.21 \$	138,400	0.21 \$	138,400	0.21 \$	138,400	0.21 \$	138,400
07-50	Roofing & Sheet Metal	2.21 \$	1,440,000	2.21 \$	1,440,000	2.21 \$	1,440,000	2.41 \$	1,574,400	2.41 \$	1,574,400	2.41 \$	1,574,400	2.41 \$	1,574,400
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22-01	Plumbing	0.26 \$	171,360	0.26 \$	171,360	0.26 \$	171,360	0.26 \$	171,360	0.16 \$	102,816	- \$	-	0.16 \$	102,816
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25-02	Photovoltaics	-	-	0.34 \$	225,000	0.69 \$	450,000	1.08 \$	705,000	-	-	-	-	-	-
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Back Up Item #		50	50	51	51	52	52	53	53	54	54	55	55	55	55
<b>SUBTOTAL</b>		<b>68 \$</b>	<b>44,070,459</b>	<b>67 \$</b>	<b>43,463,219</b>	<b>61 \$</b>	<b>39,721,759</b>	<b>60 \$</b>	<b>39,144,519</b>	<b>55 \$</b>	<b>35,738,110</b>	<b>56 \$</b>	<b>36,663,619</b>	<b>54 \$</b>	<b>35,237,150</b>
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<b>TOTAL COST - VARIABLE SCOPES</b>		<b>81 \$</b>	<b>52,884,551</b>	<b>80 \$</b>	<b>52,155,863</b>	<b>73 \$</b>	<b>47,666,111</b>	<b>72 \$</b>	<b>46,973,423</b>	<b>66 \$</b>	<b>42,885,732</b>	<b>67 \$</b>	<b>43,996,343</b>	<b>65 \$</b>	<b>42,284,580</b>
<b>TOTAL COST - ALL SCOPE</b>		<b>327 \$</b>	<b>213,630,000</b>	<b>326 \$</b>	<b>212,901,312</b>	<b>319 \$</b>	<b>208,411,560</b>	<b>318 \$</b>	<b>207,718,872</b>	<b>312 \$</b>	<b>203,631,181</b>	<b>314 \$</b>	<b>204,741,792</b>	<b>311 \$</b>	<b>203,030,029</b>
+/- to baseline			\$ (728,688)		\$ (5,218,440)		\$ (5,911,128)		\$ (9,998,819)		\$ (8,888,208)		\$ (10,599,971)		\$ (9,489,360)
% change to baseline - on TOTAL COST		NA	-0.34%		-2.44%		-2.77%		-4.68%		-4.16%		-4.96%		-4.44%
+/- to lowest cost		\$	10,599,971	\$	9,871,283	\$	5,381,531	\$	4,688,843	\$	601,152	\$	1,711,763	\$	1,110,611
% change to lowest cost - on TOTAL COST		5.22%	4.86%		2.65%		2.31%		0.30%		0.84%	NA	0.55%		4.46%

# Proposed Stretch Code: Targeted Performance Path

- What is heating “TEDI”:
  - Thermal Energy Demand Intensity
  - Amount of heating needed over 1 year
- Benefits to low TEDI
  - Easy to electrify
  - Cost effective
  - Low emissions
- Effective pathway to Zero Energy



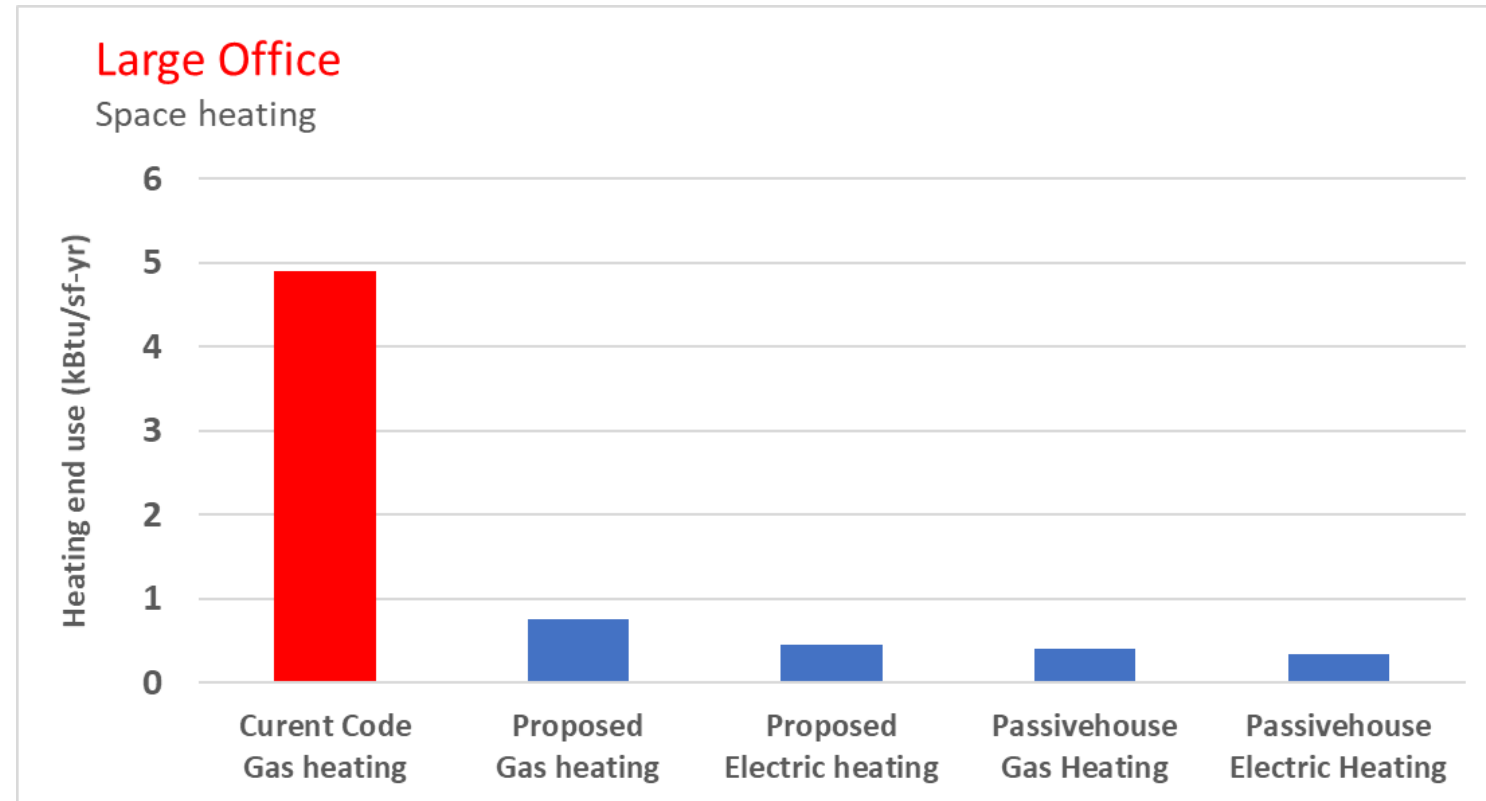
*The proposed code reduces heating TEDI by 90% for most buildings*

# Key Metric – Thermal Energy Demand Intensity (TEDI)

A design approach focused on cost-effective emissions reduction led to a key metric of heating **Thermal Energy Demand Intensity (TEDI)**. TEDI was first used in codes for Vancouver and Toronto in Canada

Targeting low heating TEDI means:

- Low emissions
- Easy electrification
- Reduced (or elim) fossil fuel
- Improved resiliency
- Improved comfort



With the proposed code, targeting low heating TEDI results in near elimination of space heating end use. Proposed TEDI code path has space heating end use comparable to Passivehouse at lower cost.



# Proposed Stretch Code: TEDI Limits

- **When TEDI applies**

- Schools
- Office (including town hall, courthouse, etc)
- Multifamily (including dormitory)

- **Heating TEDI limits (kBtu/sf-yr)**

- K-12 School < 100,000-sf 2.4
- K-12 School >= 100,000-sf 2.2
- Office < 100,000-sf 2.4
- Office >= 100,000-sf 1.5
- Multifamily TBD

- **Plus**

- Cooling TEDI limits
- Vertical envelope UA backstop
- Thermal bridge accounting
- Infiltration limits and testing



Old Colony - affordable Multi-family - Boston

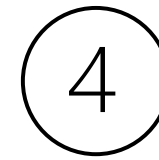
# ABC Questions

## Question

How confident are you in the technical/financial feasibility of these updates?

Can you provide case studies with different building typologies that provide proof to the real estate community that this can be implemented technically and is financially feasible?

# Example of detailed cost report



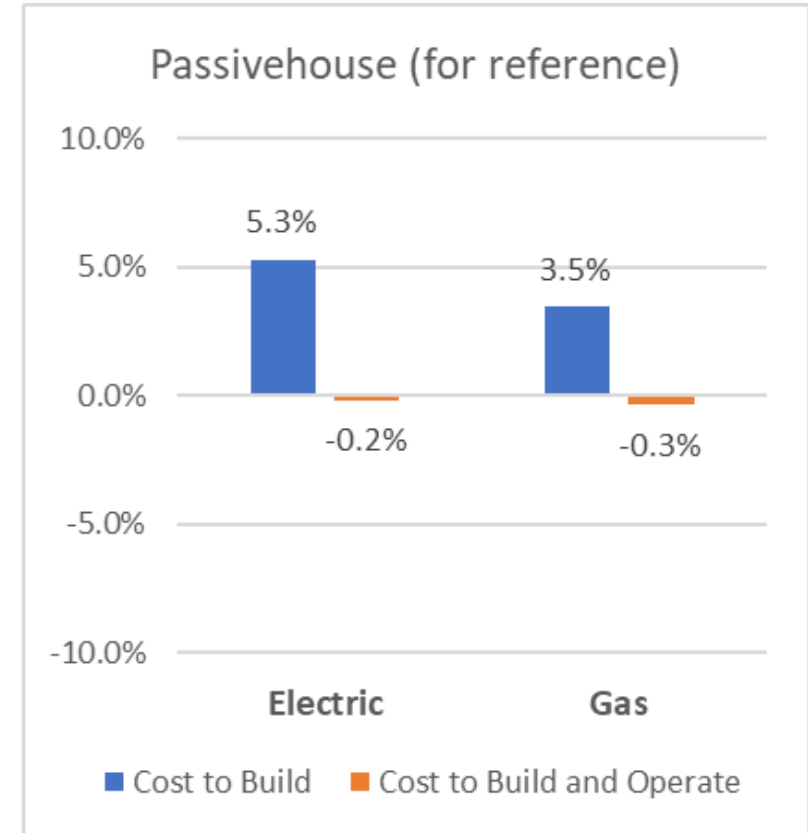
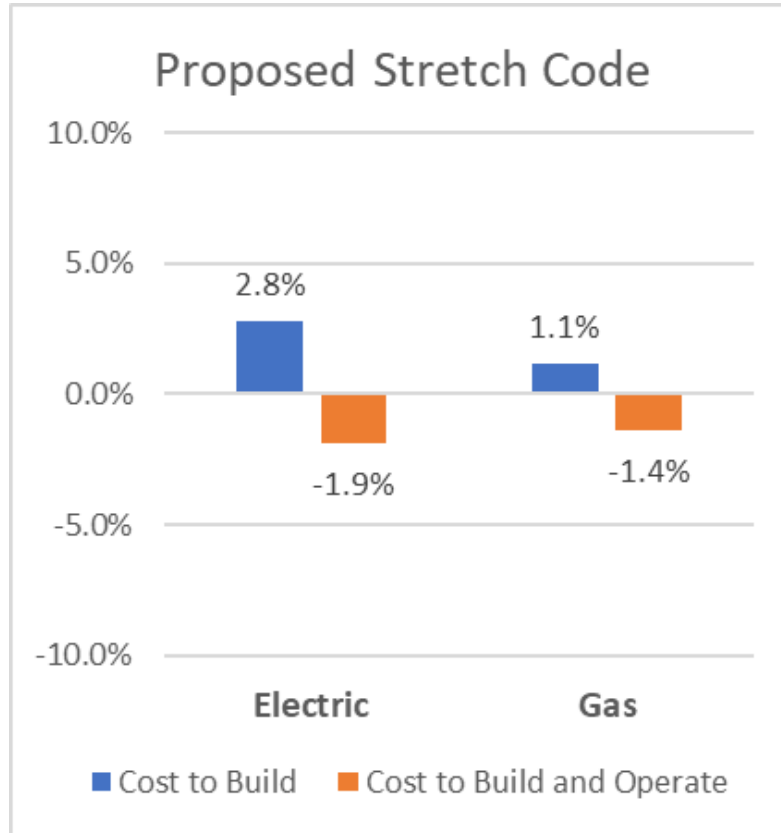
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% change to baseline - on TOTAL COST		NA	-0.34%		-2.44%		-2.77%		-4.68%		-4.16%		-4.96%		-4.44%
+/- to lowest cost		\$	10,599,971	\$	9,871,283	\$	5,381,531	\$	4,688,843	\$	601,152	\$	1,711,763	\$	1,110,611
% change to lowest cost - on TOTAL COST		5.22%	4.86%		2.65%		2.31%		0.30%		0.84%	NA	0.55%		4.46%

# Primary School – Costs (TEDI path)

- Cost to Build  
1.1% to 2.8% more
- Cost to Build and Operate (50 yr)  
1.4% to 1.9% less

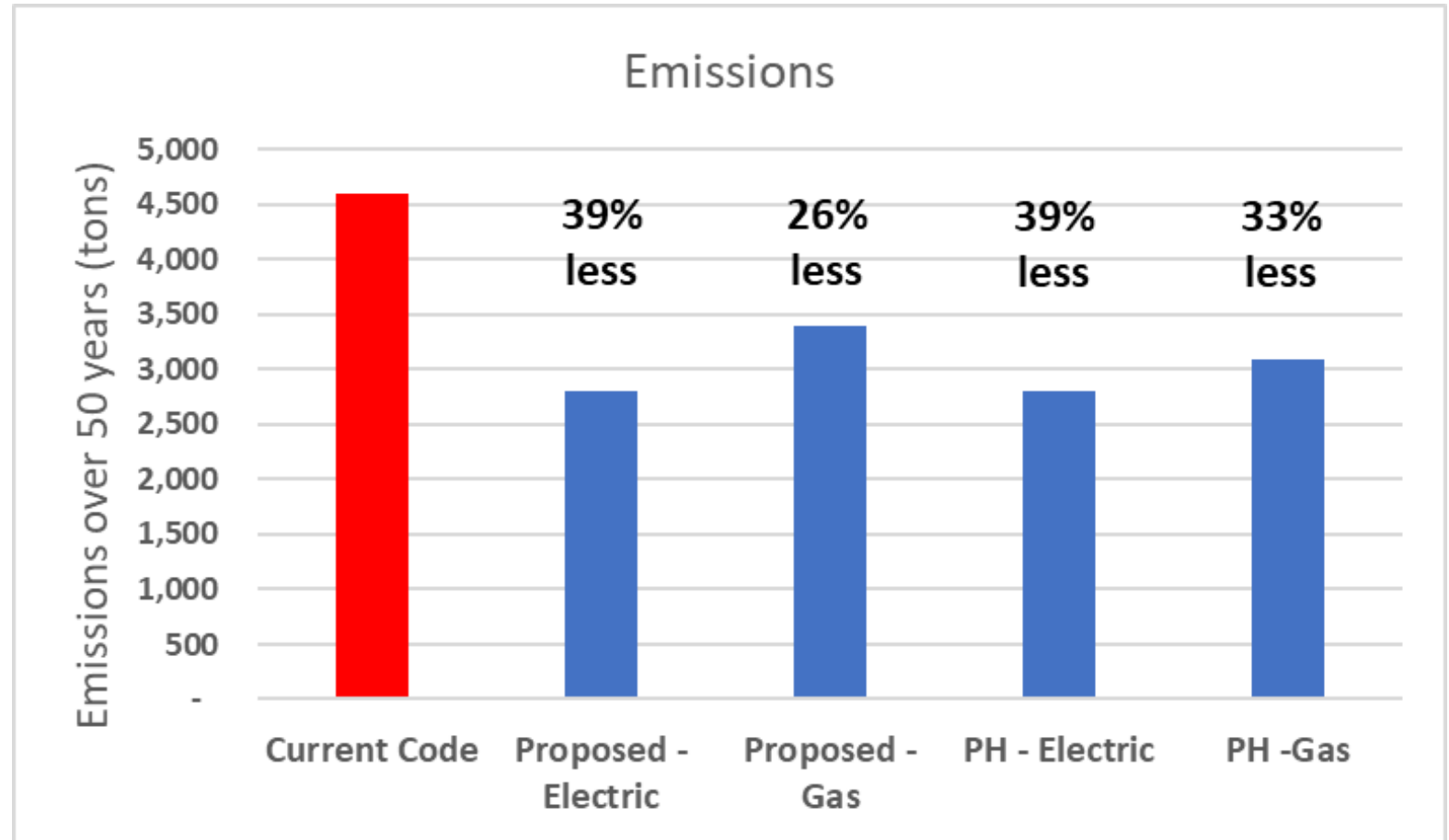




# Primary School - Emissions

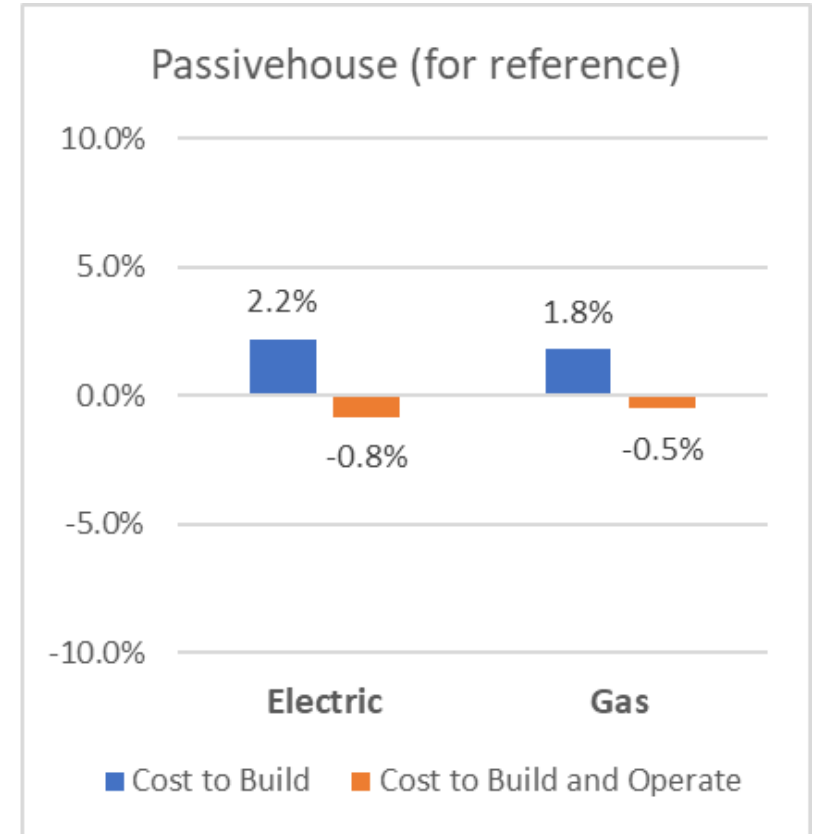
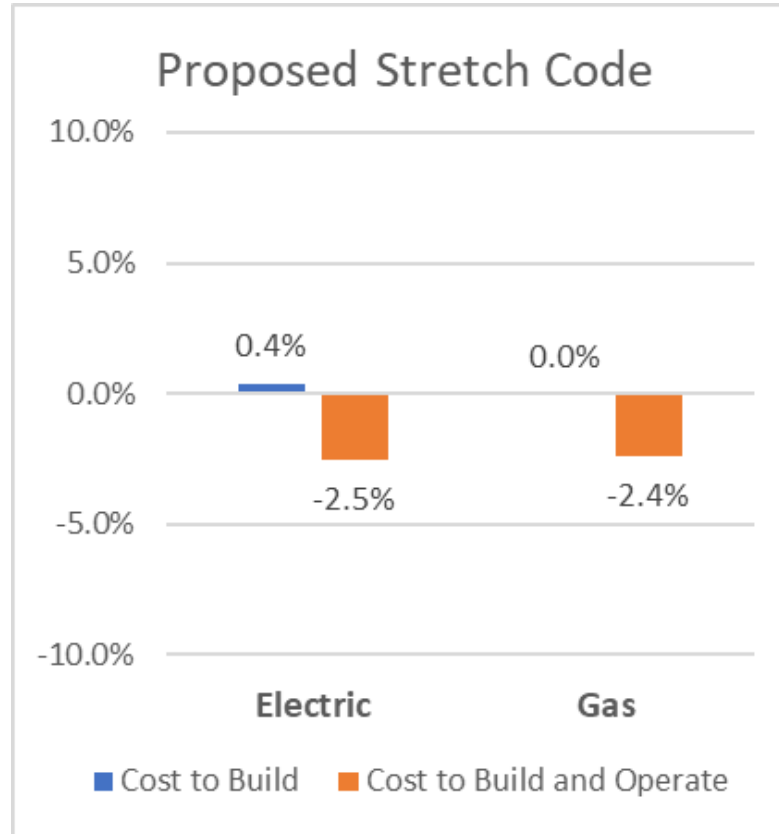
- Emission reduction  
26% to 39%
- About 90% less  
heating demand

Energy Efficiency Advantage



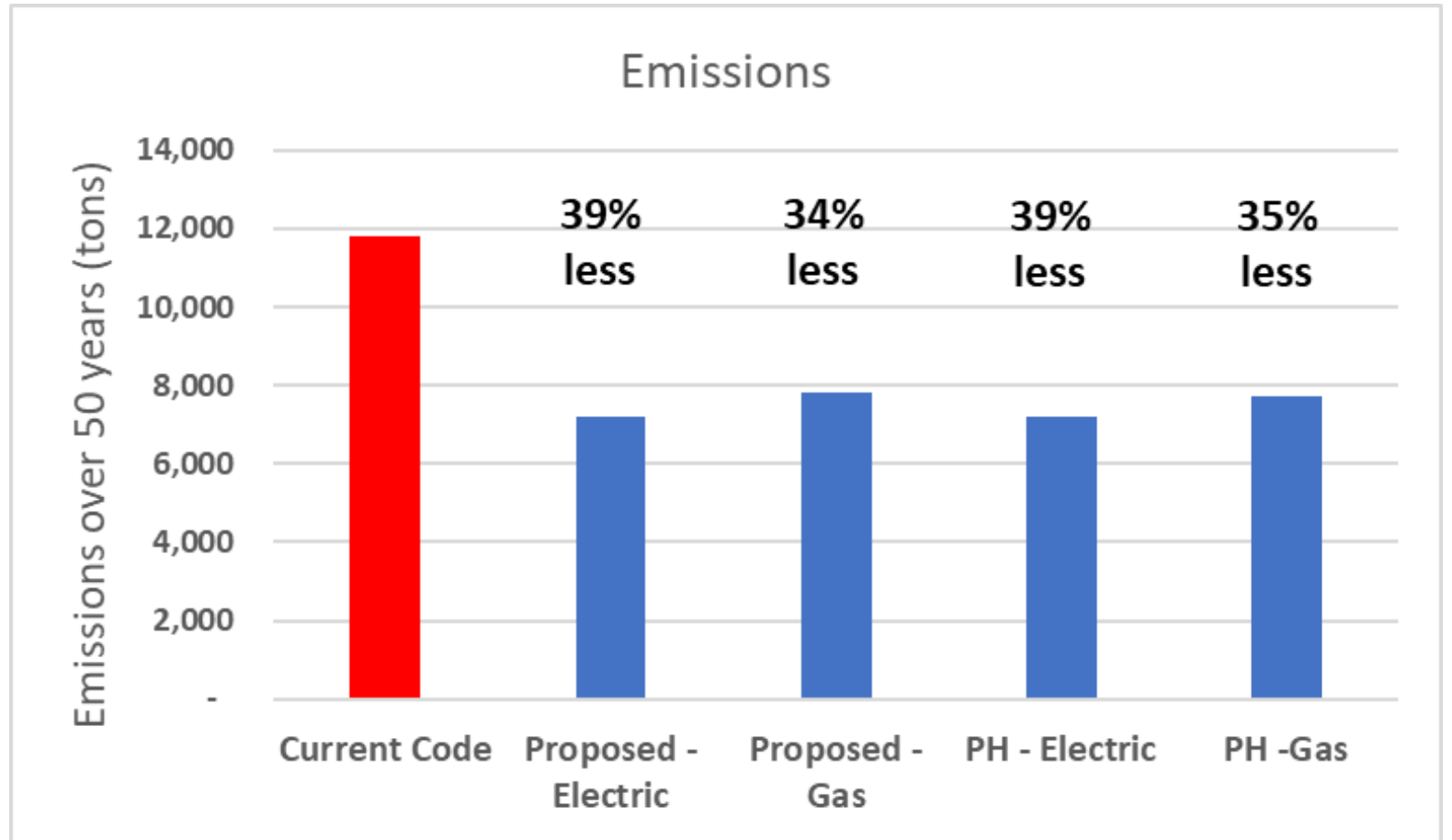
# Secondary School – Costs (TEDI path)

- Cost to Build  
0% to 0.4% more
- Cost to Building and Operate (50 yr)  
2.4% to 2.5% less



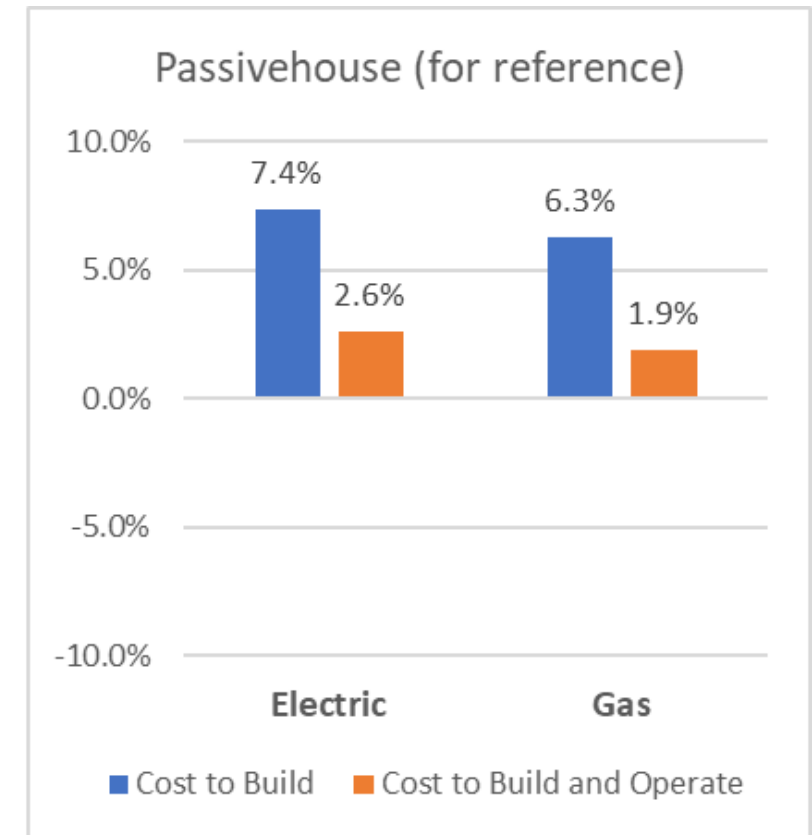
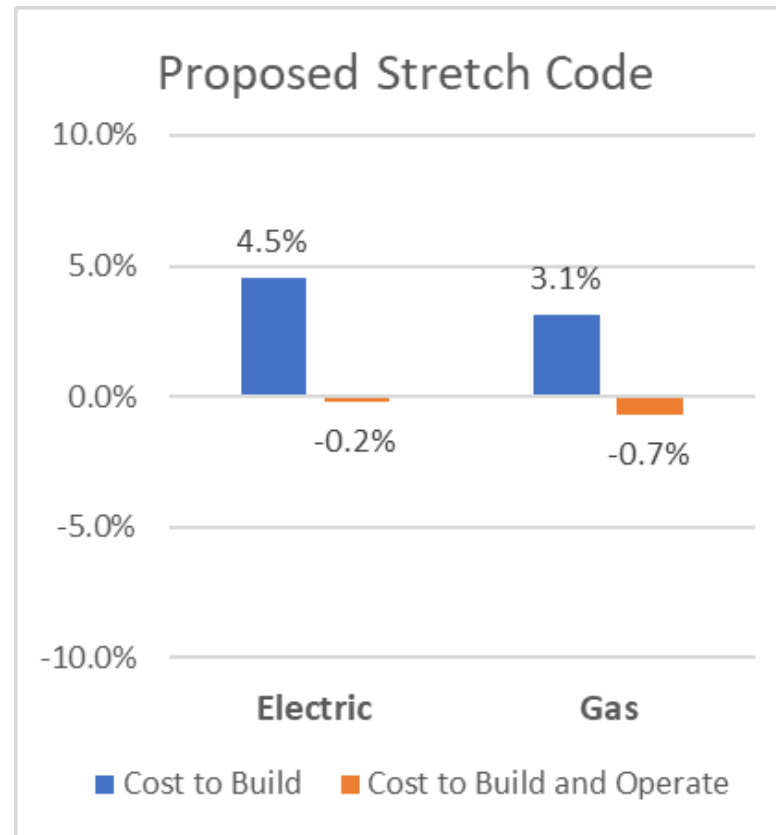
# Secondary School - Emissions

- Emission reduction  
34% to 39%
- About 90% less heating demand
- Electric advantage



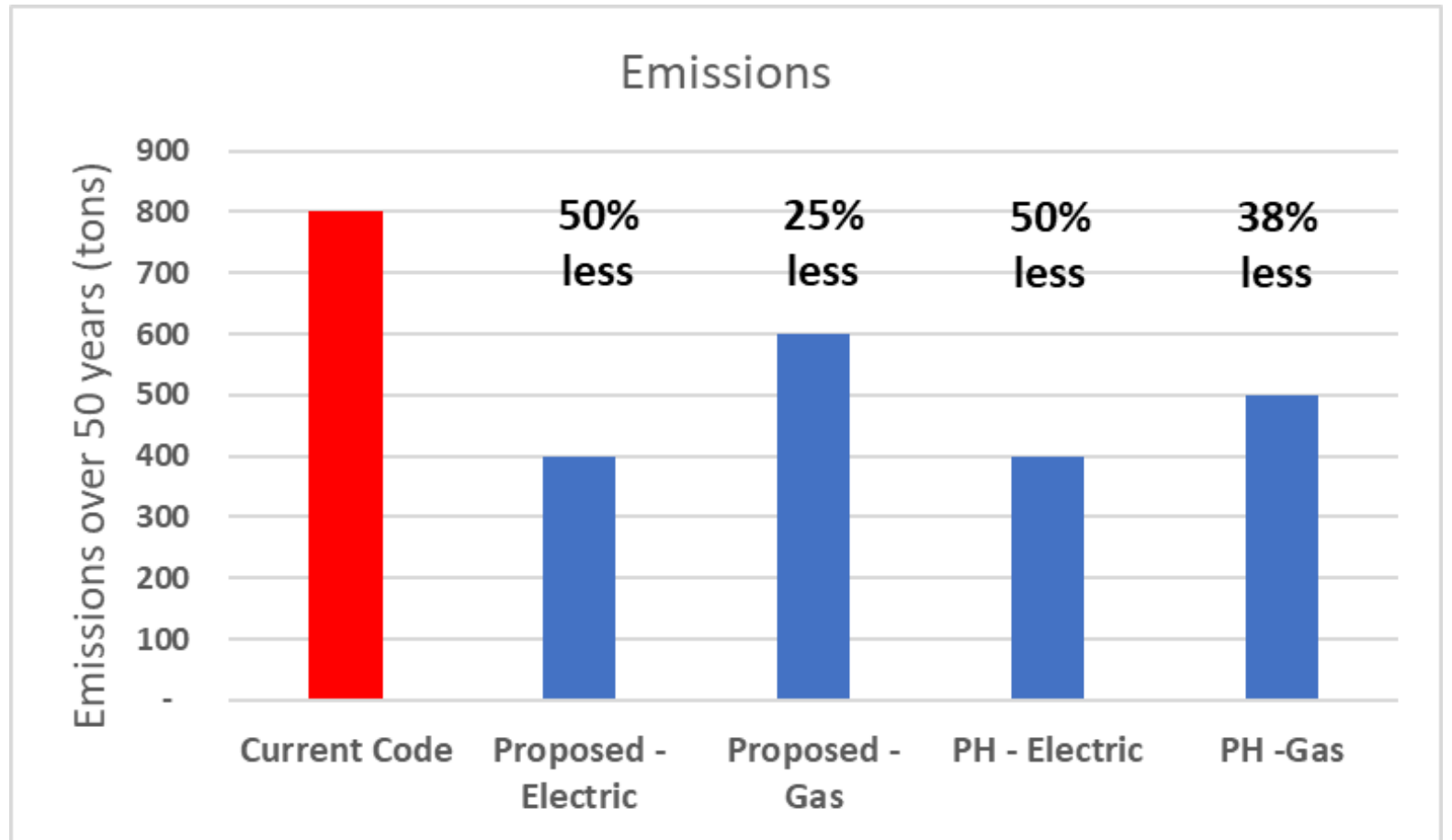
# Small Office – Costs (TEDI path)

- Cost to Build  
3.1% to 4.5%  
more
- Cost to Build and Operate (50 yr)  
0.2% to 0.7% less



# Small Office - Emissions

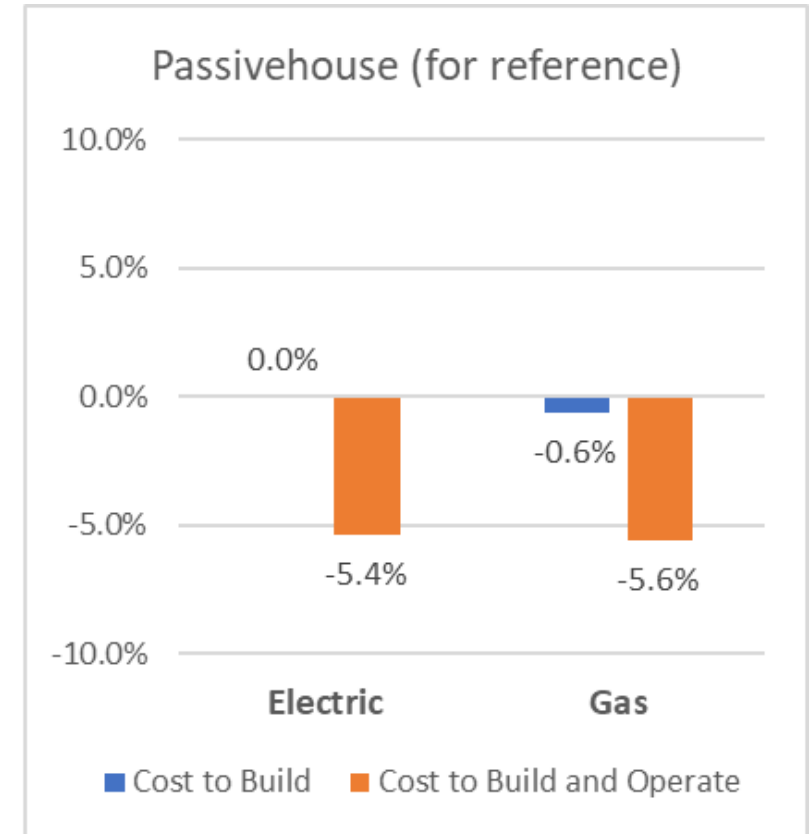
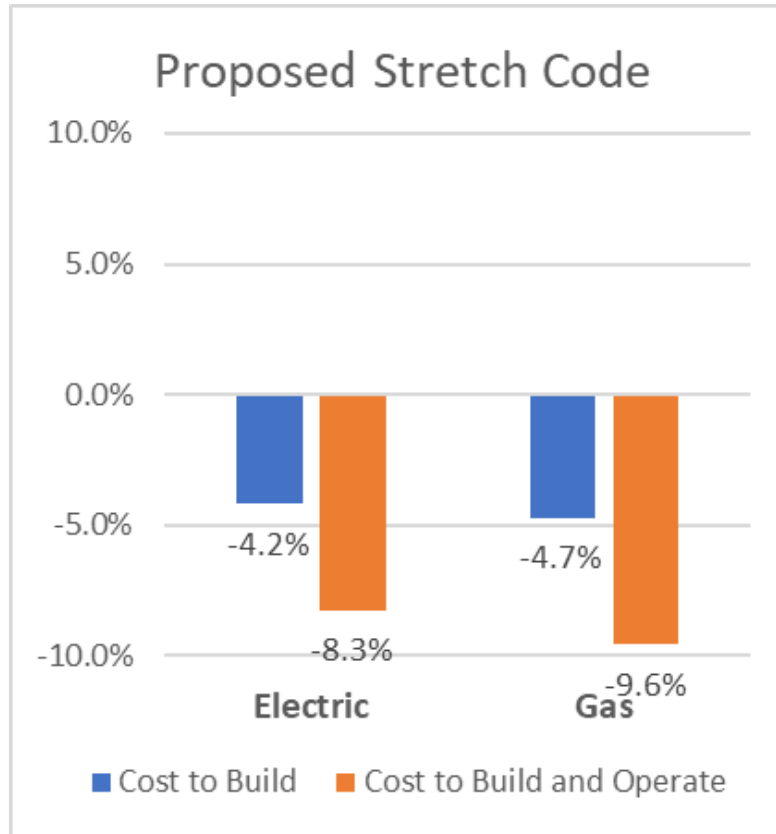
- Emission reduction  
25% to 50%
- About 90% less heating demand
- Big electric advantage





# Large Office – Costs (TEDI path)

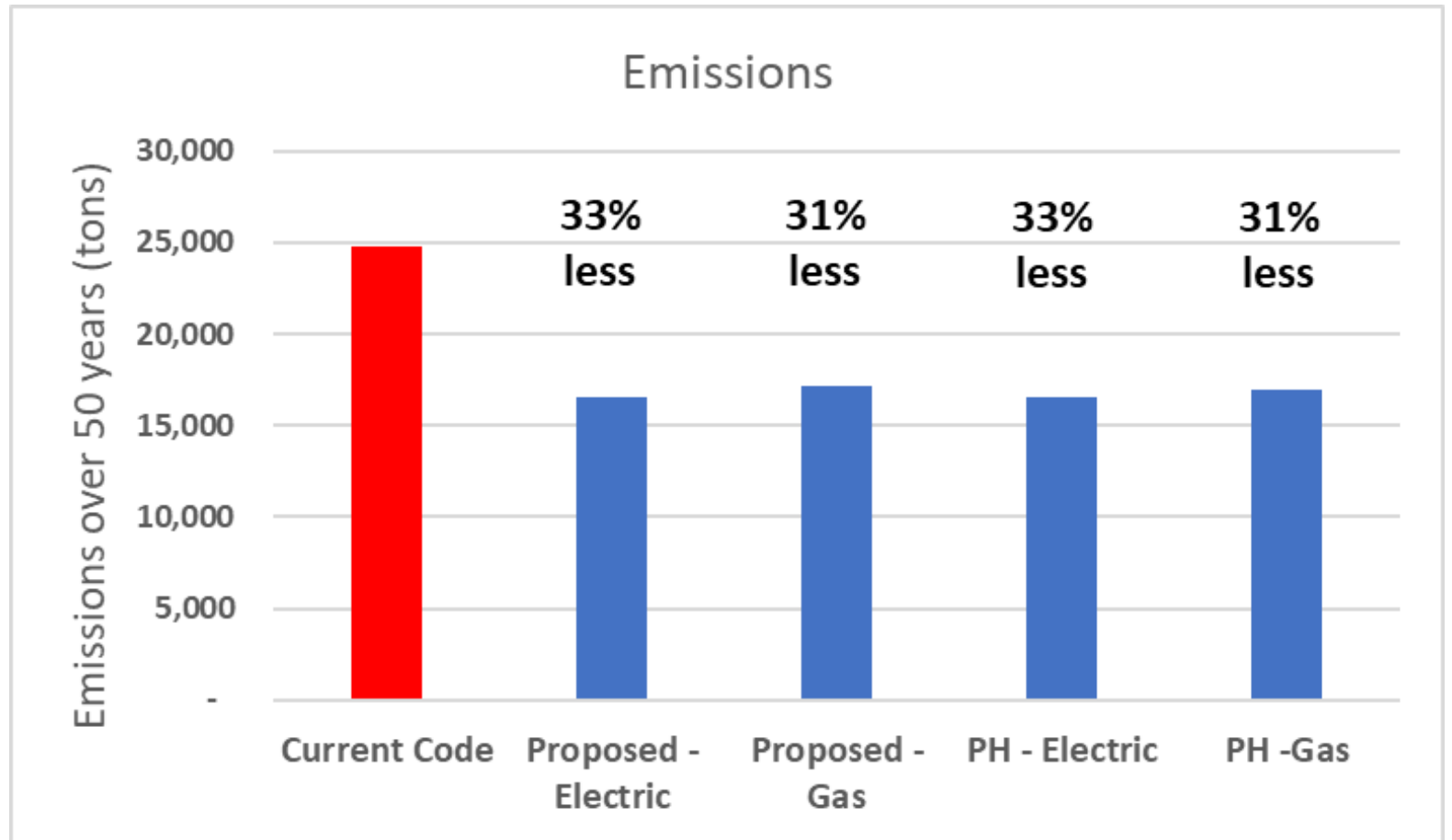
- Cost to Build
  - 4.2% to 4.7% less
- Cost to Build and Operate (50 yr)
  - 8.3% to 9.6% less
- Envelope
  - All curtain wall



LOW

# Large Office - Emissions

- Emission reduction  
31% to 33%
- About 90% less heating demand
- Electric advantage

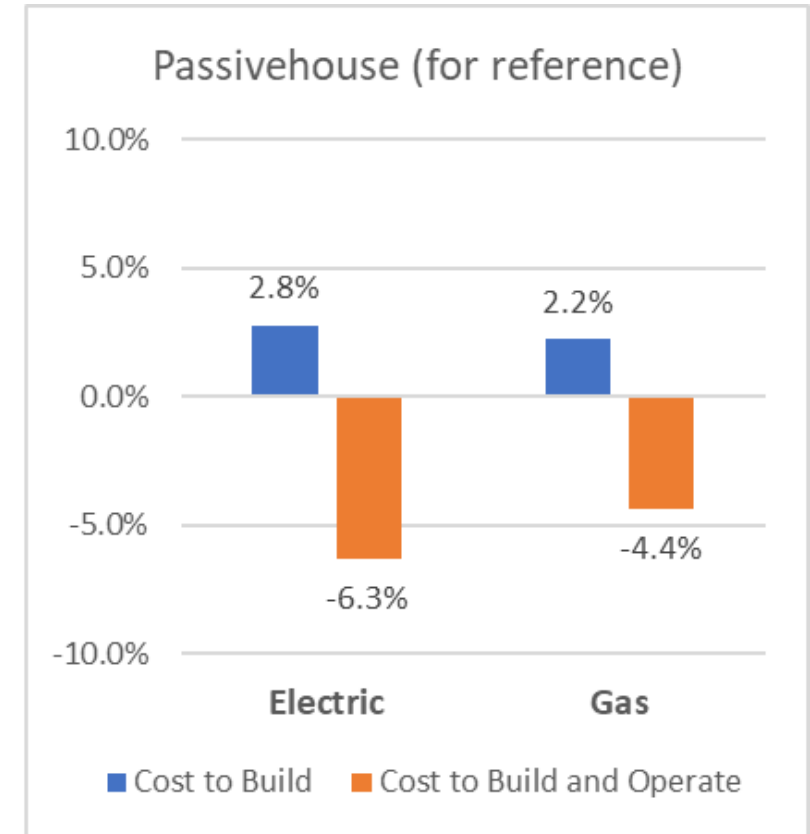
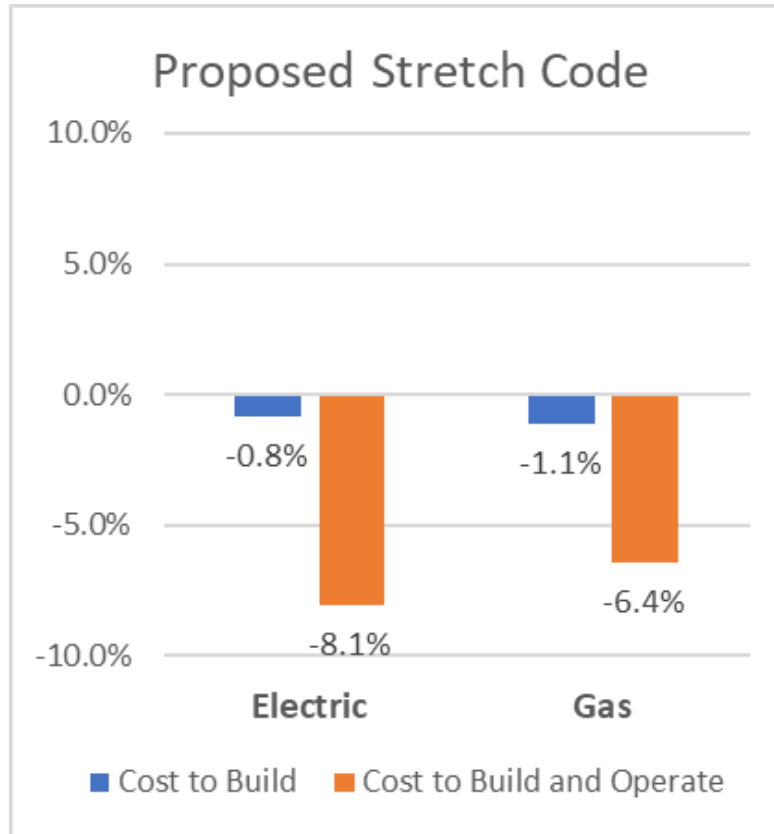


# Office/Lab – Costs (MA ASHRAE path)

- Cost to Build  
0.8% to 1.1% less
- Cost to Building and Operate (50 yr)  
6.4 to 8.1% less
- Envelope  
➤ All curtain wall



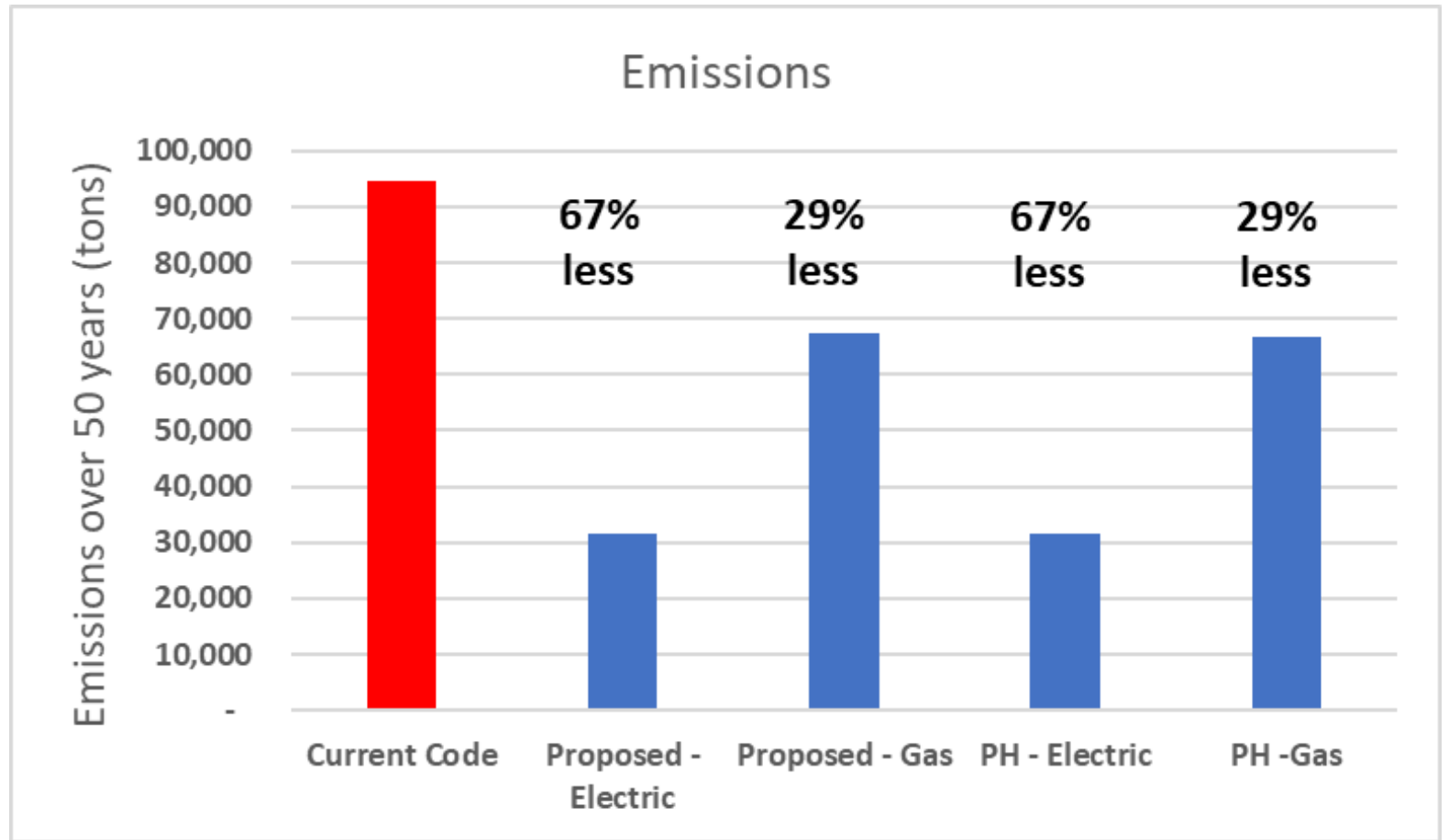
LOW





# Office/Lab - Emissions

- Emission reduction  
29% to 67%
- About 60% less  
heating demand
- Electric advantage



# ABC Questions

## Question

What impacts have the Toronto and Vancouver codes with TEDI metrics had on commercial real estate development? Are there lessons learned that were incorporated into this proposal?

Beyond cost and GHG, what impacts do you anticipate the curtain wall, air infiltration, thermal bridging, and electrification-ready requirements will have on development in Massachusetts?

- Note: What would be good to understand here is whether the workforce/supply chain/market are prepared for these options

# ABC Questions

## **Question**

What will be the process for cities/towns opting into the new specialized stretch code?

If a City adopts it, is that adopting within Green Community and associated funding opportunities or outside of it?

If outside of it, will there be funding opportunities for cities and towns associated with the adoption?

If there is opposition to a city/town opting into the high performance stretch code, what will be the process for this opposition?

If a municipality opts into the Specialized Stretch Code, what does that mean for future code updates?

# ABC Questions

## Question

How does the stretch codes development relate to the City of Boston's zero net carbon zoning standard?

a. What regulation would pre-empt what?

What retrofit threshold is triggered by each code – base, stretch and specialized stretch?

# Specialized Opt-in Code (Net Zero) - Commercial

