



June 20, 2026

Submitted via email to stretchcode@mass.gov

Ms. Becca Edson
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th floor
Boston, MA 02114

Re: Stretch Code Public Comment

Dear Ms. Edson,

On behalf of [Northeast Energy Efficiency Partnerships](#) (NEEP), we are pleased to submit comments to the Massachusetts Department of Energy Resources (DOER) on the proposed revisions to the Stretch and Specialized Code.¹ We commend DOER for continued progress with respect to the implementation of the Stretch Code and Municipal Opt-In Specialized Code. These forward-thinking codes are integral to ensuring energy-efficient, affordable, resilient, and healthy residential and commercial buildings across the Commonwealth. The efforts of DOER are also vital to moving Massachusetts closer to its goal of achieving a net-zero economy by 2050.

History shows that major code updates and introductions require attention and refinement to ensure successful implementation and effectiveness. Although the proposed update includes only modest revisions, **we commend DOER's continued engagement with the enforcement and building community and commitment to responding to challenges with code implementation in a timely manner.** While we appreciate the thoughtful revisions in this update, several areas would benefit from additional clarification to ensure consistent interpretation and effective enforcement across the Commonwealth.

We offer areas for further improvement, including:

1. Clarifications to the proposed updates to ensure requirements are applied and enforced as intended;

¹ These comments are offered by NEEP Staff and do not necessarily represent the view of NEEP Board of Directors, sponsors, or partners. NEEP is a 501 (c)(3) non-profit organization.



2. Forward-looking stretch code updates to align with proposed amendments to the 11th edition Massachusetts Building Code;
3. Recommendations from the MA Net Zero Buildings Coalition, facilitated by NEEP, during previous stretch code update cycles that remain relevant and warrant further consideration

Clarifications to proposed updates

Provide additional clarification to ensure requirements are applied and enforced as intended.

We identified several areas where additional clarification could support practitioners and promote consistent implementation and streamlined enforcement by code officials:

- Clarify qualifications for residential projects that include both alterations and additions to trigger HERS rating compliance. R503.1.5 Extensive Alterations and Level 3 Alterations now states that “projects including both alterations and additions, if the alteration exceeds 1,000 sq ft, and the addition exceeds 600 sq ft” “shall require the building or dwelling unit to comply with the maximum HERS ratings for alterations, and additions” Please clarify if the trigger for HERS rating compliance includes the minimum alteration and addition in a single dwelling unit or across an entire building.
- Remove the proposed *dwelling* definition in the residential code; it is repetitive in some areas of the code and creates unintended restrictions in others. For example, the proposed definition for ADU includes a “self-contained unit....on the same lot as a principal **dwelling**.” In this case, the dwelling definition restricts the definition of an ADU to only include lots with one or two dwelling units as the principal residence, a specification which may be more restrictive than the ADU law intended. **Principal dwelling**, while not defined in the stretch code, does not include such restrictions as defined in [760 CMR 71.00 Protected Use ADUs](#). In other areas, the dwelling definition creates redundant language. For example, RC105.1 General describes “New detached one- and two-family **dwelling**s, and townhouses with not less than 600 sq.ft.” Removing the definition of dwelling would avoid unintended restrictions and redundant language.
- Clarify the use of R401.2.4 Appendix RC as a compliance path. As written, the intent of the compliance path is unclear and could be interpreted as allowing the unamended 2021 IECC Appendix RC as a compliance path. ERI values in the 2021 IECC Appendix RC do not meet the stringency of the stretch code. This language should be amended to specify compliance



with the requirements of Appendix RC Massachusetts Municipal Opt-in Specialized Code and R404 as amended.

- The modification to R406.5.2 to require new single dwelling units or R-use buildings containing multiple dwelling units to demonstrate a total Global Warming Potential (GWP), rather than average GWP intensity, of less than 0 across the whole building envelope to achieve the insulation embodied carbon credit is now inconsistent with the requirements for R406.5.3 Documentation for insulation embodied carbon credit. Documentation requirements still allow reporting for the insulation embodied carbon credit to be averaged across a multi-dwelling unit building. This language should be modified to reflect the changes to qualify for the credit.
- Clarify where possible that the Specialized Opt-in code applies to new buildings only. For example, amend the updated text “RC101.2 Application. Residential buildings shall comply with Section R404.4 (EV wiring)” to “RC101.2 Application. **New residential buildings in Specialized Opt-in code communities** shall comply with Section R404.4 (EV wiring).”
- RC101.2 Application, Exception 1 allows “Group R-1 occupancies containing sleeping units where the occupants are primarily transient in nature such as hotels (transient) and motels (transient) [to] comply with R401.2.1 Prescriptive compliance option including R401.2.5 Additional Energy Efficiency.” This exception immediately follows the requirement for “R-use buildings with total conditioned floor area greater than 12,000 sq.ft. [to] comply with the provisions of Section R405 (Passive House).” Please clarify if the Exception 1 allowance for compliance with the prescriptive path applies to all Group R-1 buildings or only to Group R-1 buildings with total conditioned floor area greater than 12,000 square feet.
- Clarify Table C407.1.1.5 Thermal Energy Demand Intensity limits to avoid confusion. We recommend amending the text “All other $\leq$ 75,000-sf” to read “All other between 40,000 and 75,000-sf.”

Consider forward-looking updates

Forward-looking updates will align the stretch code with proposed changes to the 11th edition of the Massachusetts State Building Code (11th edition) to keep pace with evolving changes to the base energy code. The following amendments have been proposed by DOER and approved



by the Energy Advisory Subcommittee (EAS) and the Board of Building Regulations and Standards (BBRS) for inclusion in the proposed version of the 11th edition that will be presented for public comment. Duplicating these amendments in the stretch code will meet its intent to maintain enhanced energy efficiency relative to the base code once it is adopted in early 2028. While the following list covers residential code amendments, commercial code amendments proposed for the 11th edition should similarly be considered for the stretch code once they have been approved by the EAS and BBRS for public comment.

- Require that space conditioning equipment and ductwork shall be located inside conditioned space for dwelling units with basements or conditioned crawlspaces, with exceptions for single package systems and 10 feet or 10 percent of ductwork permitted to be located outside conditioned space. In proposing this amendment, DOER cited a recent evaluation for Mass Save that identified ducts as a high source of non-compliance and energy loss. Moreover, this change is already integrated into the proposed draft of the 2027 IECC which will be the base for the 12th edition MA building code.
- Reduce the maximum vertical fenestration U-factor in Tables R402.1.2 and R402.1.3 from 0.3 to match the proposed changes to the 11th edition. The 2024 IECC, which is the model code for the 11th edition, reduces the maximum fenestration U-factor to 0.28. Furthermore, an amendment proposed by DOER would further reduce the U-factor to 0.25 for new windows, 0.27 for replacement windows, and would increase the maximum fenestration U-factor to 0.3 for windows subject to a historic district commission review. Energy Star windows are currently widely available at a U-factor as low as 0.22, double paned and with multiple styles and frame materials. We recommend that the stretch code mirrors the changes proposed to the 11th edition because these elevated requirements are financially feasible and this change will maintain the stretch energy efficiency relative to the base code once the 11th edition is adopted in early 2028.

Consider previous recommendations to strengthen implementation

The following recommendations from previous stretch code update cycles remain relevant.

The following concerns were raised in public comment letters signed by the MA Net Zero Buildings Coalition, facilitated by NEEP, dated April 2025 and September 2024:



- **Blended Code and Documentation:** One of the recurring requests from stakeholders is that Massachusetts create a "blended code" that integrates base code language with the updated Stretch and Specialized Codes for ease of reference. We strongly urge DOER to prioritize the completion of this document and to ensure it provides access to technical guidance and practical tools, including links to compliance documentation (e.g., COMCheck) and thermal bridge databases specific to Massachusetts.
- **Energy Modeling Assistance:** We continue to hear from building practitioners about the need for clearer guidance and collaboration on energy modeling for compliance. Creating partnerships and providing tools for energy model review would significantly aid professionals in adhering to the updated code requirements.
- **Increased Support for Stakeholder Engagement:** A key area that requires attention is the expansion of resources to engage a more diverse range of stakeholders, particularly small businesses and under-resourced professionals who may struggle to navigate the complexity of these updated codes. Smaller contractors working in rural areas of the state with fewer projects that require compliance may need additional support to implement new requirements without causing work delays that can reduce profitability. Consistent, accessible support from DOER in all areas of the state are essential to ensuring equitable compliance and adoption.
- **Curtainwall De-rating for Thermal Breaks:** Section C503.2.4 offers general guidance on thermal de-rating for walls with thermal bridges, but it does not fully address the unique thermal performance challenges of curtainwall systems. It's important to address the complexity of tables for determining curtainwall de-rating for thermal breaks because the current format can lead to confusion and errors in energy code compliance. Simplifying these tables would improve clarity for designers and builders, ensuring more accurate assessments of thermal performance and encouraging broader adoption of energy-efficient practices.
- **Change of Use in Existing Buildings:** Section C505.1 lacks clarity around 'change of use' requirements, particularly in cases where there is an increase in energy use. For instance, the 2025 Technical Guidance document suggests that an office building which increases its ventilation to meet lab program requirements would qualify as a 'change of use', even though it may not constitute a change of use per the MA building code. However, designers



have been told by DOER that a building that is increasing its ventilation to meet minimum IAQ standards (e.g., an existing building lacking a ventilation system) would not need to meet the 'change of use' requirements per the Stretch Code. More clarity about which scenarios trigger a 'change of use' per the Stretch Code is needed to ensure consistency in code enforcement and avoid misapplication.

Taken together, these refinements will help ensure the Stretch and Specialized Codes are both forward leaning and practical for the range of practitioners across the state. In conclusion, we appreciate DOER's continued dialogue with stakeholders and examination of how to ease code implementation for the building and enforcement community. We look forward to continued conversation to address remaining priority issues that are essential for the successful implementation of these codes. By ensuring these remaining concerns are addressed, Massachusetts will continue to lead the nation in building a sustainable, affordable, and equitable future for all its residents and businesses.

Thank you for your attention and for your ongoing work in this critical area.

Sincerely,

A handwritten signature in black ink, reading 'Charlotte Weigel', is positioned below the 'Sincerely,' text. The signature is written in a cursive, flowing style.

Charlotte Weigel

Manager, Codes and Standards

Northeast Energy Efficiency Partnerships