

Reference Chart Comparing the 2025 Commercial Stretch Code to the 10th Edition Commercial Base Code

Updated by MA Net Zero Building Coalition, facilitated by NEEP, as of March 2025.

This chart highlights important differences between the categories listed, but is not meant to be an exhaustive technical reference.

For official documentation, please refer to:

<https://www.mass.gov/info-details/2025-massachusetts-building-energy-codes>

Legend	
	Does not exist in this iteration/not addressed
	Update per 10th Edition base code (based on 2021 IECC)
	Update per 2025 Stretch Code

Section Number	Section Name in 2025 Stretch Code or 10th Edition	Previous Code for Green Communities (9th edition based on 2018 IECC + 2016 Stretch + 2/2020 update to 9th edition)	10th Edition language (based on 2021 IECC)	2025 Stretch Code
Commercial				
C401.2.1	Prescriptive and performance compliance		Introduces prescriptive and total building performance pathways.	The stretch code replaces the total building performance pathway with the targeted performance and relative performance pathways. The relative performance pathway includes language outlining compliance with ASHRAE 90.1-2019. The stretch code also includes options for compliance via Passive House or HERS ratings.
C401.4	Building electrification			Matches up compliance pathways with electrification requirements and includes heat pump requirements.
C402.1.5	Component performance alternative	Calculations are based on an equation. 2/20 update clarifies this section applies to buildings that follow ASHRAE standards.	Updated component performance alternative equation for maximum allowable fenestration area.	Provides compliance pathways for low- and high-glazed wall system buildings, replacing equations for maximum allowable fenestration area.
C402.4	Fenestration	Includes allowable max U factor table	Max U factors are lower than previously	Max U factors are the same as the 10th Edition Code.
C402.5	Air leakage - thermal envelope	Acceptable air leakage rate is 0.4 cfm/ft2	Adds more detailed language - maintains acceptable air leakage rate of 0.4 cfm/ft2 for building thermal envelope testing. Adds a section on dwelling and sleeping unit enclosures with an acceptable air leakage rate of 0.3 cfm/ft2.	Removes dwelling and sleeping unit enclosure air leakage rate. The acceptable air leakage rate for building thermal envelope testing is 0.35 cfm/ft2. Adds section 402.5.2.1 on methods for whole-building testing for air leakage.
C402.5.1.5	Building envelope performance verification		Adds section details requirements for building envelope inspection.	Removed in the 2025 Stretch Code.
C402.5.11	Operable openings interlocking		Adds section that requires operable openings larger than 40 ft2 to be linked to building heating and cooling systems. Cooling temperature setpoint is 90 degrees F and heating setpoint is 55 degrees F.	Renumbers as Section C402.5.10 and changes heating setpoint to 50 degrees F.
C402.7	Derating and thermal bridging			Mandates that buildings need to account for thermal bridging when showing compliance and provides a methodology for calculations
C403.1	General		Adds exception for data center systems	2025 Stretch Code is the same as the 10th Edition.
C403.1.2	Data centers		Adds section that lays out how code will apply to data centers.	2025 Stretch Code is the same as the 10th Edition.
C403.2.3	Fault detection and diagnostics		Adds a section on including a fault detection system for HVAC systems for area >100,000 sq ft.	2025 Stretch Code is the same as the 10th Edition.

Reference Chart Comparing the 2025 Commercial Stretch Code to the 10th Edition Commercial Base Code

Updated by MA Net Zero Building Coalition, facilitated by NEEP, as of March 2025.

This chart highlights important differences between the categories listed, but is not meant to be an exhaustive technical reference.

For official documentation, please refer to:

<https://www.mass.gov/info-details/2025-massachusetts-building-energy-codes>

Legend	
	Does not exist in this iteration/not addressed
	Update per 10th Edition base code (based on 2021 IECC)
	Update per 2025 Stretch Code

Section Number	Section Name in 2025 Stretch Code or 10th Edition	Previous Code for Green Communities (9th edition based on 2018 IECC + 2016 Stretch + 2/2020 update to 9th edition)	10th Edition language (based on 2021 IECC)	2025 Stretch Code
Commercial				
C403.3.2	HVAC equipment performance requirements	Tables included	Min efficiency requirements and second table test procedure updated. Some table entries differ and more detailed than 9th edition.	Tables C403.3.2(8) and C403.3.2(9) are replaced with the 2024 IECC versions of these tables. The updated tables are generally similar to the 2021 IECC versions, with some simplifications, changes in testing methods, and changes in performance metric (e.g. SEER vs SEER2)
C403.5	Economizers	This section exists in the 9th Edition Code without the added line from the 2025 Stretch Code.	The language in the 9th and 10th Editions is largely similar. The 10th Edition Code adds Variable Refrigerant Flow (VRF) systems installed with dedicated outdoor air systems to exceptions.	Adds "dedicated outside air systems" to list of air and water economizers.
C403.7.1	Demand control ventilation	Establishes demand control ventilation requirements for spaces with an occupant load of 25 people larger than 500 ft2.	Changes occupant load of 15 people. Includes more exceptions.	2025 Stretch Code is the same as the 10th Edition.
C403.7.4	Energy recovery systems	Requires energy recovery systems when supply airflow rate of a fan system exceeds provided table values.	New subsections: C403.7.4.1 Nontransient Dwelling Units introduces an enthalpy recovery ratio of min 50% at the cooling design condition and 60% at the heating design condition and C403.7.4.2 which generally corresponds to 9th edition language.	Changes minimum enthalpy recovery ratio from 60% to 75% for heating design condition and adds requirements for systems at or above the design outdoor airflow in section 403.7.4.1. Replaces C403.7.4.2 requirements with two options: 1) a sensible energy recovery ratio of 50% of the heating design condition and 2) a sensible energy recovery ratio of a minimum of 70% at heating design conditions and airflows and an enthalpy recovery ratio of minimum 60% at heating and cooling design conditions and airflows.
C403.8.3	Fan efficiency	Includes less detailed requirements for fan efficiency	Section is updated and includes more specific requirements.	2025 Stretch Code is the same as the 10th Edition.
C403.8.5	Low-capacity ventilation plans		Adds section that includes min efficiency table for low-capacity ventilation fans.	2025 Stretch Code is the same as the 10th Edition.
C403.14	Operable open interlocking controls		Adds section requiring operable opening interlocking systems to have the cooling setpoint to 90 degrees F and a heating setpoint to 55 degrees F.	2025 Stretch Code is the same as the 10th Edition.
C404.2.1	High input service water heating systems	Requires min thermal efficiency of 90%	Updates thermal efficiency min to 92%.	2025 Stretch Code is the same as the 10th Edition.
C404.5.2.1	Water volume determination		Adds table for internal volume of various water distribution tubing.	2025 Stretch Code is the same as the 10th Edition.

Reference Chart Comparing the 2025 Commercial Stretch Code to the 10th Edition Commercial Base Code

Updated by MA Net Zero Building Coalition, facilitated by NEEP, as of March 2025.

This chart highlights important differences between the categories listed, but is not meant to be an exhaustive technical reference.

For official documentation, please refer to: <https://www.mass.gov/info-details/2025-massachusetts-building-energy-codes>

Legend	
	Does not exist in this iteration/not addressed
	Update per 10th Edition base code (based on 2021 IECC)
	Update per 2025 Stretch Code

Section Number	Section Name in 2025 Stretch Code or 10th Edition	Previous Code for Green Communities (9th edition based on 2018 IECC + 2016 Stretch + 2/2020 update to 9th edition)	10th Edition language (based on 2021 IECC)	2025 Stretch Code
Commercial				
C405.1	General	Exempts dwelling units in commercial buildings and walk-in refrigerated spaces from electrical power and lighting systems.	Edits section to include sleeping units and new subsection C405.1.1 that sets min efficiency for lighting for dwelling units.	2025 Stretch Code is the same as the 10th Edition.
C405.2.4.4	Atriums		Adds section on daylight zones in atriums.	2025 Stretch Code is the same as the 10th Edition.
C405.2.7.3	Lighting setback	Includes compliance list for lighting setbacks	Adds requirements for wattage reduction and parking area compliance specifications.	2025 Stretch Code is the same as the 10th Edition.
C405.2.8	Parking garage lighting control		Adds section on parking garage lighting that requires occupant sensors or a time-switch control.	2025 Stretch Code is the same as the 10th Edition.
C405.4	Lighting for plant growth and maintenance		Adds section on lighting for plant growth	2025 Stretch Code is the same as the 10th Edition.
C405.11	Automatic receptacle control		Adds section on receptacle (office) lighting	2025 Stretch Code is the same as the 10th Edition.
C405.12	Energy monitoring		Adds section on energy monitoring for buildings with a conditioned floor area over 25,000 ft ² .	2025 Stretch Code is the same as the 10th Edition.
C405.13	Electric vehicle ready parking spaces ("EV Ready Spaces") (Mandatory)	Corresponds to C405.10. Parking lots with 15+ spaces require 1 EV space.	All parking lots with at least 2 spaces have a required amount of EV spots per table in section.	Requires min 20% EV-ready spaces for Group B and R, all others need to have min 10% EV-ready spaces, updated exceptions language.
C406.1	Additional energy efficiency credit requirements	2/2020 update - eliminates exceptions and list is expanded to 10 types of buildings.	Uses credit system - 15 credits from new tables listed in section - and lists 13 types of buildings covered under the section	Replaces and removes some rows of tables, efficient fossil fuel water heaters do not count towards credits. Adds credit options for low Global Warming Potential (GWP) concrete mix and next zero GWP insulation.
C406.2	More efficient HVAC equipment performance	10% min efficiency requirements for HVAC equipment.	New sections for 5% increased efficiency and 10% increased efficiency for heating and cooling.	Eliminates section on 5% increased efficiency for heating. Replaces 10% increased efficiency for heating with a section on renewable space heating.
C406.3	Reduced lighting power	Total connected interior lighting power required to be < 90% total lighting power allowance, including exterior lighting.	New subsections for 10% and 15% and min lamp efficiency	2025 Stretch Code is the same as the 10th Edition.
C406.12,13,14, 15	Efficient kitchen equipment, Renewable space heating, Heavy timber construction		Adds sections for min efficiencies for commercial kitchen equipment, renewable space heating, and heavy timber construction. Renewable space heating is allotted 10 credits.	2025 Stretch Code adds lines to tables in section C406.1 about renewable space heating (15 credits), heavy timber construction (8 credits), Low GWP concrete mix (8 credits), and Net Zero GWP insulation (8 credits). Renewable space heating language is included in section C406.2.3. Heavy timber construction is included in C406.13. Low GWP concrete mix is included in C406.14. Net zero GWP insulation is included in C406.15.

Reference Chart Comparing the 2025 Commercial Stretch Code to the 10th Edition Commercial Base Code

Updated by MA Net Zero Building Coalition, facilitated by NEEP, as of March 2025.

This chart highlights important differences between the categories listed, but is not meant to be an exhaustive technical reference.

For official documentation, please refer to: <https://www.mass.gov/info-details/2025-massachusetts-building-energy-codes>

Legend	
	Does not exist in this iteration/not addressed
	Update per 10th Edition base code (based on 2021 IECC)
	Update per 2025 Stretch Code

Section Number	Section Name in 2025 Stretch Code or 10th Edition	Previous Code for Green Communities (9th edition based on 2018 IECC + 2016 Stretch + 2/2020 update to 9th edition)	10th Edition language (based on 2021 IECC)	2025 Stretch Code
Commercial				
C407.1,2,3,4	Building performance certification methods	Includes compliance methods for ERI for multifamily, PHIUS, outlines mandatory requirements, and ERI-based compliance. Language on compliance software tools.	Replaces ERI method with HERS Index and HERS-based compliance.	Replaces language in section C407. Outlines compliance based on building performance modeling, climatic conditions, modeling building envelope infiltration, thermal energy demand intensity (TEDI) limits, and mixed-use buildings. Includes documentation requirements and passive house documentation requirements. New section added about documentation for design certified Passive House projects that fail final certification.
C407.5	Documentation	2/20 update - Includes documentation requirements with detailed subsections on ERI and PHIUS.	Updates subsections on HERS and PHIUS documentation to match new requirements. Language generally the same.	2025 Stretch Code is the same as the 10th Edition.
C502.1	Additions	If a project is following ASHRAE, it is exempt from following C402 through C405.	10th edition language is generally the same as the 9th edition.	Changes applicability around existing commercial buildings when an addition is <100% of the size of the existing building and <20,000 ft ² .
C503.1	General	Includes a list of exceptions. Exception 3 exempts building cavities exposed during construction and filled with insulation.	10th edition language is the same as the 9th edition, but generalizes exemptions to alterations complying with ANSI/ASHRAE/IESNA 90.1.	Replaces exception 3 from 2021 IECC language with a new language that limits max UA to 110% of target UA. Adds exception 7 around wall cavities exposed during construction.
Appendix CA	Board of Appeals - Commercial		Adds appendix, proposed as included in 2021 IECC base code.	2025 Stretch Code is the same as the 10th Edition.
Appendix CB	Solar Ready Zone - Commercial	Corresponds to Appendix CA - Solar Ready Zone - Commercial	Appendix CB is adopted unamended, which adds a section on electric energy storage system-ready area.	2025 Stretch Code is the same as the 10th Edition.
Appendix CC	Zero Energy Commercial Building Provisions		Adds appendix, proposed as included in 2021 IECC base code.	Renames Appendix CC: Massachusetts Municipal Opt-In Specialized Energy Code of 2025. Now outlines the Massachusetts-specific specialized stretch code.