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Office of the Governor
Massachusetts State House
Beacon St #280
Boston, MA 02133

January 5, 2021

Re: S.2995, An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy

Dear Governor Baker:

On behalf of our nearly 130 member companies in Greater Boston, thank you for your continued leadership on climate change and clean energy in Massachusetts. In respect to S.2995: An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, we applaud the opportunity to affirm the Commonwealth's commitment to greenhouse gas emissions reduction across all sectors. While there are many elements of S.2995 that warrant your support and approval—such as the science-based emission reduction targets, environmental justice commitments, and renewable energy accessibility and procurement measures—there are other bill elements that require further deliberation to understand their full implications. At this juncture, A Better City respectfully urges you to consider vetoing the following bill components.

Net Zero Stretch Code

A Better City supports the intent of a net zero stretch code, but does not support the net zero stretch code as currently constructed. More specifically, a net zero stretch code must be built upon and informed by robust stakeholder engagement, and the Board of Building Regulations and Standards (BBRS) should be leading this process in partnership with Department of Energy Resources (DOER). A Better City urges you to reject the current language and to support the initiation of a process to design and eventually implement a net zero stretch code, but only after extensive engagement from the building sector and broader business community.

Five-Year Emission Reduction Sublimits

A Better City does not support the establishment of five-year emission reduction sublimits, as this timeline would create a substantial administrative burden for our members, many of whom require longer-term planning horizons, and the Commonwealth, which has historically struggled with timely greenhouse gas inventory reporting. A Better City supports emission reduction targets at ten-year intervals.

Sector-Specific Sublimits

While it is reasonable to assert that sector-specific targets for a given year cannot, in aggregate, exceed the statewide greenhouse gas emissions limit for the year, A Better City is concerned that this construct may set de facto sector-specific emission reduction targets without the requisite stakeholder engagement and technical input. A Better City



supports sector-specific emissions reduction targets in concept, but recommends robust stakeholder engagement before quantifying any sector-specific emissions reduction targets.

Diversion of \$12 Million in Energy Efficiency Funds

While we agree that more investments must be made into clean energy equity workforce development, A Better City does not support the diversion of \$12,000,000 annually in energy efficiency funds. With 86,000 buildings in the City of Boston alone needing to be retrofitted in order to achieve net zero by 2050, these energy efficiency dollars are essential. A Better City suggests looking to other funding sources for workforce development, potentially from the market-based compliance mechanisms detailed in S.2995.

As our regional economy and impacted businesses work to recover from the ongoing COVID-19 pandemic, we thank you for your consideration, and for your continued leadership. A Better City members look forward to working with the Baker Administration to help achieve the Commonwealth's climate and economic goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rick Dimino', with a stylized, cursive script.

Rick Dimino
President and CEO
A Better City

Cc: The Honorable Karen Spilka, Senate President
The Honorable Ronald Mariano, Speaker of the House