

Feb. 1. 2021

Comments on draft DRI Energy Policy: November 2020–January 2021

Top concerns:

- Need for further education and initiatives related to energy efficiency options and incentives.
- Need flexibility in regard to the solar requirement.
- Concerns about being allowed to install solar panels on other properties – they should be installed where they are most effective.
- Need flexibility in regard to commercial projects.
- Allow people to buy renewable energy from Eversource as an alternative.
- What additional infrastructure or other changes are required for the island to go all-electric?
- Need to review policy every so often.
- How does this align with state policies and regulations, given Brookline decision and uniform regs?
- Need to clarify/reduce the monetary burden on homeowners.
- Concern about guidelines becoming mandates.
- Importance of economic competition and training new workers.
- How will this affect fossil fuel related companies like Packer's and Rymes?
- Are all-electric systems really/always more efficient?
- How to take energy efficiency and renewable energy initiatives beyond the MVC?

MV Commissioners (11/12/20 and 11/19/20)

- Michael Kim: There are cases where all-electric systems use more carbon than fossil fuel systems. Example of tankless water heaters.
- Adam Turner: Have we met with propane and oil businesses?
- Trip Barnes: Why not consider nuclear power?
- Applicants may want to see something more specific to their project.
- Jim Vercruyse: Give examples of projects where the policy was met, especially in regard to electric vehicles.
- Jim Joyce: What is happening with net metering in MA? Is it going away?
- Doug Sederholm: The solar alternatives might be a heavy lift for some applicants.
- Jim Vercruyse: Question of linking applicants to outside entities in regard to solar alternatives.
- Kathy Newman: Should we have a list of options for the solar alternatives, or more established efforts they can buy into?
- Doug Sederholm: Include review provision – every 18 months.
- Christine Todd: How do we enforce the policy?
- Michael Kim: Object to onsite solar requirement. Solar panels could be placed on buildings with higher energy use instead.
- Michael Kim: Mandate seasonal shutdowns for seasonal properties? (MVC could file an application to the BBRs to get around insulation requirements.)
- Fred Hancock: Need more give and take for commercial projects, which generally have more limitations.

Fred Hancock (MV Commissioner) (11/20/20)

- It's a stretch to say the policy would have any direct effect on climate change. Lead with "reliability of supply" and "economic impacts" before "climate mitigation."

Newell Shinn (MVBA) (11/21/20)

- Two issues MVBA members will raise: The Brookline precedent, and fear that MVC is doing something illegal. Policy committee needs concise, comprehensive answers.
- When you are presenting it, have a cover that reminds people what the DRI process is, and list the policies. MVC has a range of policies that together say how they want a project to behave. Make it clear that the energy policy is treated the same as the others.

Adan Hayes (MVBA) (11/21/20)

- MVBA members will be confused about how the policy connects to the big house discussion (Checklist item 4.2). The policy committee needs to clarify that it has nothing to do with 4.2 or big houses, and that this is a policy with a program already in place.

Kate Warner (West Tisbury energy committee) (11/30/20)

- Suggested edits to the benefits section, including removal of language related to the reliability of supply and fossil fuel price fluctuation
- Mention goal of having the policy encourage towns to reduce GHG emission in the building sector
- Include all electric systems in bullet points in section 2
- The energy code is about to meet the stretch code, so some language in section 2 could be removed

Chilmark selectmen (12/1/20)

- What other feedback have you gotten?
- What if we had a proposal to rebuild the gas station in Menemsha with a new dock, but they want to knock down building and rebuild the gas station, how would this policy affect the project?
- What is the difference here between a policy and a guideline?
- What is the timeline to go through and make notes on the policy?
- Would this policy apply to individuals trying to build an affordable house, such as at Peaked Hill?

Oak Bluffs selectmen (12/8/20)

Brian Packish:

- Many people have reached out to me. At first glance, I look at energy efficiency standard and think no big deal, we are all at or about to adopt stretch code. The 100% solar requirement is

more problematic. I understand this is just a guideline, but the guideline becomes the minimum bar. In our downtown, we have very small footprints and roof areas. Simply not enough roof area to get there. So you are looking at an offsite scenario. Couple that with the affordable housing requirement. Layers that become counter intuitive to the end result goal. If you had a mixed use building downtown, to get to 100% solar you are looking at an offsite scenario where you need to buy rent or lease other property, or buy credits from other folks. If you are just adding solar to other homes, you need X amount. Disagree with the statement that the expense to applicants is minimal. With the Lamppost project, it was cost about \$200,000 for a transformer to meet the energy requirement. For every push there is a pull. We need to be mindful. 100% offsite solar as an option is good, but if we hold people to that, it will become highly problematic in our downtown.

- All of the slides presented are accurate. We are ahead of curve, we need to be mindful and do better. As we talk about mandating, we are talking about largest projects on MV (DRIs). So we need to be mindful of our workforce. Many people earn a living by supporting homes, but they can be retrained. To enact an energy policy, it is MVC's responsibility to create a reeducation component to incentivize people to go further. This will impact them and families. That is not to diminish how climate change affects them, but we need to think about them as well.
- Anytime we take steps, it is inevitable to push or pull in different directions. It's hard to see the harm on the other side of it. At the end of the day, there are reasonable steps that could be included to address things I referenced. With all honesty, the MVC is often flexible, but often not. There must be leniency or concessions when applicants demonstrate genuine hardship. The policy doesn't leave a lot of room for that. Just want to put that out there clearly.

Gail Barmakian:

- Echo Brian. I believe in the theory, but we can't do anything with tunnel vision or in a vacuum. For instance, exclusive reliance on electric supply would have to increase a lot. How realistic is that? Exclusive reliance on one thing is always a danger. The push to electric as the only solution – how does that affect propane, gas, electricians, etc.? We need to go forward with flexibility.
- Example: When you talk about offshore wind, we still don't know what effect large scale offshore wind has on oceans. Yet we are putting in something that may have another destructive effect. Can there also be an analysis of the additional money this will cost for projects? How about going hand in hand with promoting conservation of energy usage.

Greg Coogan:

- Huge project here, congrats. We have to have some faith in the elected reps to have that leniency with applicants as they try to put this into effect. We all know we need it's well needed.

Further comments from Chilmark selectman Jim Malkin (12/15/20)

- A large amount of serious work and detailed analysis behind this proposal
- As a policy relying on much state information and standards – rather than being a mandate – it leaves appropriate room in its introductory statement that there is leeway in benefits and detriments evaluation to approve or deny projects that meet or fail to meet some of all of the policy
- The use of the words “target” and “facilitate” are appropriate rather than the word “require”
- Reasonable and appropriate with 5-year review

- The work with outside experts including Eversource engineers on long term planning provides comfort in the analysis
- Question about planning and design principles – is the issue of fire danger in landscaping a town issue and/or not part of this effort?
- I would recommend that the town support this policy

West Tisbury selectmen (12/16/20)

- Skipper Manter: Commendations
- Cindy Mitchell: Supportive. What’s next in the process? How do you move toward a final draft?
- Kent Healey: Measuring energy use is a good way to judge projects, but also electricity or fossil fuel use is not the only energy applicants are responsible for. About 1/3 of energy is in the stuff we buy. Glad you are doing this.
- Kate Warner (West Tisbury energy committee): This is a step in the right direction. West Tisbury already passed the 100% renewable warrant article. We are at a sea change. The more we embark on these things, the more people will be used to the idea of all-electric design, and considering climate change more in their decisions. That is important for the survival of MV and the planet. I hope you will give this your support.

Ted Rosbeck (MVBA, 12/16/20)

Regardless of the Commissions potential legal ability to do so given the very unique power granted to them, SHOULD the Commission be adopting any Policy that contradicts State building code in direct opposition to the State’s desire to have a unified building code throughout the Commonwealth and has recently legally ruled on numerous times that it does not want localities enacting law or policy that makes the code less “or more” restrictive in nature? Just last year, the State ruled against the Town of Brookline for trying to adopt a bylaw that proposed to ban the use of fossil fuels in residential construction. The State has directly referenced energy and the use of fossil fuels as something the State Building Code directly governs. Further, unlike a water quality policy that can directly impact our ponds and local waters, energy and the use of fossil fuels in construction is not a unique challenge to Martha’s Vineyard, nor does the Commission have some unique education or expertise above and beyond the State and International experts that would warrant such a radical departure from the Building Code. To assume the Commission has the expertise and authority to override the State in an area that is not directly related to regional impact and the island of Martha’s Vineyard, can be setting a dangerously arrogant precedence.

More specifically, what makes the island of Martha’s Vineyard different or unique that requires the Commission to adopt a policy that overrides State Building Code? Does the Commission have some unique education or expertise that the State does not which would warrant such a radical change? Is what is being proposed morally superior to the rest of the State?

MV Builders Association (12/17/21)

Newell Shinn:

- Why are there different building standards for different kinds of projects?
- Have had not any calls about heat pumps not working in my 5 years at South Mountain.
- Stunning how much work you have been doing on this. Grateful.

- I support solar 100%. But some of the benefits disappear if you are just paying for another person to have it. So the logic breaks down a little for offsite generation.

Ted Rosbeck:

- In regard to Brookline decision and state efforts toward unified regs, why is MVC departing from state standards and state building code?
- Expand on the onsite generation requirements, and the background on that. Why would that be relevant to energy policy?
- Hard to get onsite solar. Not sure how that would work, if you pay for someone else's solar, when you could change your supplier instead. Pools in CH can't use fossils, so we use heat pumps, and have client switch to renewable energy supplier through Eversource. Can choose whether it's from wind, solar, or combo, and it doesn't cost more. I would like to see more discussion about not such a radical change, with an option to switch your supplier. Maybe a short term solution.

Tom Carberry:

- In regard to onsite solar requirement, was thinking about the limitations of some job sites where you can't do that. Language should include option to buy renewable energy from Eversource if you don't have the ability to generate it all yourself.
- I think that the growth of solar power in the last 20 years has been increased by the incentives that have been offered at a state and federal level. Has the Commission discussed possible incentives to increase the enthusiasm for making these changes?

Norman Rankow:

- In historically motivated architecture, people don't like to see solar panels, and there are limited roof areas. We always try to push toward heat pumps, but there is an added expense to extra generation. We have people on MV who can do the work, and the competition is there. But there is a fine line between policy and if it becomes a mandate. Need flexibility on the solar requirement.

Adam Hayes:

- Good presentation, good info, including annotations to policy.
- I am seeing the air source heat pumps are hitting all the marks. Mostly coming out for deep cycle and hyper heat, and there is an ability with inverters for -20 degrees. They are getting better and better for efficiency, so hitting cold winter months is not an issue. Talk about parallels between MVC and Cape Cod regional policies.
- Is anyone working toward for solar co-ops? Seems like that would help support this policy. I'm not seeing these co-ops happen. Have you spoken with the Land Bank?

Other (via chat):

- What happens when heat pumps need backup under 30 degrees?
- What is the cost of all-electric when there is no competition? I would think we would see prices rise.
- Do we have the infrastructure to support the electric? I know the large poles had been installed a few years ago to carry the wiring. What else is going to need to happen to move to all electric? Are those things happening now?
- How is the grid electric being produced? By fossil fuels? Would Eversource be obligated to disclose how and where the power is coming from? Does it concern anyone that we will be more dependent on off island sources?

Richard Andre:

- In general, we will need more undersea cables connecting us to the mainland. We currently have 4. Plus increased battery storage on island.
- Our grid mix is currently at 30+% renewables and will be above 50% in 2030.

Keith McGuire:

- The problem is very dire. How can we get to 100% renewables faster than this energy policy can do?
- Heard about Austin TX, which required contractors building a new house to exchange toilets. For every toilet they had to show proof they had exchanged 3 bad toilets from another house. Radical way to get everyone to have water efficient fixtures.

Aquinnah Board of Selectmen (1/5/21) (Dan Doyle)

- Praise was given from Town Administrator for comprehensive materials.
- Does Trump disagree with global warming?
- How do we get these facts and information out to the general public and lower the hurdles to implementing renewables on our respective properties?
- Aquinnah already has a 2000 square foot review of homes with the PB; perhaps these energy related items could be bundled in; the Planning Board could be a mechanism to create bylaws that reflect this and justify with the presentation and content that was provided here.
- Site constraints won't likely create a huge hurdle in Aquinnah, and financially it makes such great sense as well.

Edgartown Planning Board (1/5/21)

Alan Strahler:

- I support. CO2 concentration has gone up from 300 something to 400 something in my lifetime, geological change. Hope other groups also support.

Scott Morgan:

- Heat pumps are more expensive than propane. Hard enough for us to be here anyway with the cost of living. Restrictions and expectations on homebuilders could harm a lot of people who are on a shoestring budget. But those are also quality people, need them to stay here. Don't chase them away.
- I'm all for it. But if you go green overnight, then you have to think about year round employers, like Packer, Rymes, drivers, etc. Double edged sword. Would love to see us go all electric, but there are ramifications in the long run that I hope you take into account.

Ted Rosbeck:

- Captivating presentation. Echoes Scott's comments about cost burden. Concerned about possible requirement for onsite or offsite mitigation for solar or renewable energy generation. Solar costs a lot of money upfront. Was there a cost analysis that includes the upfront cost?

Mike McCourt:

- The planet is changing. The only way to combat that is to change ourselves. Has to be through awareness. Compliments on getting this out, and getting us up to speed. The more we understand this situation, the more change will be happening with everyone's personal life.

Bonnie Widdoes:

- We need constant presentations to disseminate info about programs that offer help, what is the cheapest technology, etc. Things change quickly. Need to keep informing people so they know what they can afford and what makes sense. (Mike McCourt agreed.)

Tisbury Board of Selectmen (1/12/21)

Jay Grande:

- Are there specific regs or performance standards beyond the policy?

Ross Seavey:

- What might be a residential project that is considered energy intensive?
- Correction: Mass base building code now requires area of solar-ready, not just the stretch code. That is required of all residential buildings in MA.
- Good policy. Reflects where building code is now and where it's going. New one requires EV hookups for all new residences.
- Glad to see the policy has tiered approach based on floor area. Keep in mind the cost. We are sending more regular folks to MVC for review. What are those costs to people. MVC is currently seeing more large, high end homes, where it's easier to pay for things. But I'm concerned about the influx of additional projects.

Jeff Kristal:

- Send printed policy without draft mark.
- How is the policy diff than 2008 policy?
- What happens in 10 years if there are better ways to achieve efficiency?

Edgartown Board of Selectmen (1/25/21)

Art Smadbeck:

- At the town level we already produce solar, but can only use it for town use. Is there some group working toward having legislators change the rules so we can produce electricity on MV that can be used locally by residents? Eversource is the problem.
- I expect this restriction that allows the electric companies to keep us from making our own electricity, that will slowly go away.

Alan Strahler:

- There are a couple new programs in the last few months that allow us to generate more power than we are getting from solar arrays. We could put solar on the fire department, for example.

Michael Donaroma:

- What triggers the new policy?