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October 1, 2025

The Honorable Michael J. Barrett
The Honorable Mark J. Cusack
Chairs
Joint Committee on Telecommunications, Utilities and Energy
Massachusetts Legislature
24 Beacon St.
Boston, MA 02133

Re: House Bill 3529, "An Act Relative to Building Energy and Decarbonization"

Dear Chairs Barrett and Cusack, and Members of the Joint Committee:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating, and Air Conditioning Engineers, to provide comments on H. 3529, currently assigned to your committee. ASHRAE supports the provision in this legislation that would establish Building Energy Performance Standards for large buildings.

ASHRAE is a not-for-profit technical and professional society of more than 55,000 members, including more than 1,000 in Massachusetts. ASHRAE develops consensus-based building standards, including those concerning energy efficiency, indoor air quality, and sustainability. We recommend adding references in this legislation to the following ASHRAE standards, which can assist with implementing the required building energy and carbon emissions reductions:

- ANSI/ASHRAE/IES Standard 100-2024, Energy and Emissions Building Performance Standard for Existing Buildings, provides processes and procedures for reducing energy consumption and carbon emissions through improved energy efficiency and performance of all types of existing buildings, including residential, commercial, institutional, and industrial. It also includes tables to help determine Energy Use Intensity (EUI) targets.
- ASHRAE Standard 105-2021, Standard Methods for Determining, Expressing and Comparing Building Energy Performance and Greenhouse Gas Emissions, provides a comparison of design and operation strategies in new and existing buildings, and assists with the development of building energy and carbon performance standards, as well as the reporting of energy use and greenhouse gas emissions associated with building operations.

- ASHRAE Standard 211-2018 (Reaffirmed 2023), Standard for Commercial Building Energy Audits, establishes consistent practices for conducting and reporting energy audits for commercial buildings, and defines the procedures required to perform ASHRAE Energy Audit Levels 1, 2, and 3. This standard can be used by building owners conducting an audit of their facilities, and by government bodies that require energy audits within their jurisdiction. The procedures and reporting requirements can be adjusted by each jurisdiction to fit its goals and priorities.
- ASHRAE Standard 214-2017 (Reaffirmed 2023), Standard for Determining and Expressing Building Energy Performance in a Rating Program, provides uniformity for the building energy labeling and disclosure process.

If you have any questions or need additional information, please do not hesitate to contact me or have your staff email <u>GovAffairs@ashrae.org</u>. Thank you for your consideration of this important matter and for working to improve the energy efficiency and performance of existing buildings.

Sincerely,

Bill McQuade

ASHRAE Society President, 2025-2026

CC: The Honorable Representative Joan Meschino