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September 29, 2021

Mark Stewart
Program Manager
Climate Change Program

Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

Re: Building Energy Transition Plan Draft Recommendations

Dear Mr. Stewart:

On behalf of the U.S. Green Building Council (USGBC), a non-profit organization with nearly 9,000 member companies nationwide and a robust Maryland community, we are pleased to provide our comments on the draft Building Energy Transition Plan. We appreciate the opportunity to offer our recommendations to strengthen the plan's intent.

USGBC is committed to transforming the way all buildings and communities are designed, built, and operated to enable a more sustainable, resilient, and prosperous environment that improves the quality of life for all. USGBC is perhaps best known as the developer of the Leadership in Energy and Environmental Design (LEED) green building rating system. LEED is the industry standard in green building and is demonstrated to reduce energy consumption and related costs for business owners and operators.

USGBC Recommendations for Building Energy Transition Plan

The draft Building Energy Transition Plan focuses primarily on needed policies and programs to accelerate the transition of building heating and cooling from fossil fuels towards electric systems powered by clean renewable energy. Our comments herein are oriented towards that focus, but USGBC urges MDE to implement an efficiency-first approach. Placing excess demands on the power grid before it is predominantly clean energy, and before the grid capacity is ready, could lead to challenges in meeting state GHG emission reduction goals and unnecessarily perpetuate fossil fuel power plants for peaking. Thus, it is critical that efficiency be emphasized along with moving towards all electric buildings, and to communicate to the public and stakeholders the

planned grid transition in terms of demands from buildings and EV charging juxtaposed with clean and renewable energy sources.

USGBC outlines below our recommendations for the draft Building Energy Transition Plan:

1) Prioritize Energy Efficiency in Building Energy Transition Efforts

USGBC supports the inclusion of energy efficiency when considering the Commission's recommendation to require all new buildings to be fully electric by 2024. Energy efficiency should be an aligned goal and supporting strategy in the plan's framework.

The Commission should also encourage buildings to meet their goals for energy efficiency via electrification pathways, by means of tax incentives and subsidies that will support the replacement of fossil fuel-based systems in a timely manner. To help achieve fully electric and electric-ready buildings, USGBC recommends that the Commission develop an implementation plan with the education of the workforce, the building sector, and consumers. The Commission also should work on the state level with localities to promote federal rebates and subsidies should they become available.

USGBC supports the proposal in the draft plan for fuel switching and beneficial electrification (recommendation 2). These efforts will support the state's goal of reducing greenhouse gas emissions by 50 percent from 2006 levels by 2030 and reach net-zero emissions by 2045. The plan proposes that this process shall not begin until 2024, but USGBC encourages the Commission to act immediately. Rapid action will enable Maryland to meet its GHG reduction targets.

2) Develop a Utility Transition Plan in Coordination with Buildings

USGBC supports the development of a utility transition plan (recommendation 5). Any utility plan should be developed and implemented alongside the plan for the transition of buildings.

USGBC also supports identifying locations that need grid updates to accommodate new, all-electric buildings (recommendation 17). This should include clear information and data on each utility's clean energy transition and the GHG intensity of power from each utility, each year. This will help illustrate the optimal timing of building heat electrification

3) Address Specific Efficiency Needs in Affordable Housing Stock

USGBC strongly recommends the creation and implementation of a comprehensive retrofit program for low-income households (recommendation 2 E). By establishing such a program, the Commission and the state of Maryland will support much-needed retrofits to residents in need, including installation of heat pumps, enhanced weatherization, and addressing other health and safety concerns in existing buildings. USGBC supports equitable access to energy efficient and resilient sources of energy, and this program will enable low-income residents to reach their goal of a stable, affordable energy supply.

4) Encourage high-performing green building certification programs by recognizing them as compliant with the state-adopted International Energy Conservation Code

Green building certification programs like LEED can support buildings' energy efficiency goals, not only through efficiency minimum prerequisites and points towards certification, but also through best practices such as commissioning and building-grid integration. USGBC appreciates and supports the Commission's proposal (recommendation 14) to recognize above-code green programs like LEED as sufficient for compliance with the state-adopted IECC. LEED provides a blueprint for achieving deep energy efficiency and even zero energy status with LEED Zero Energy certification.

For more on LEED Zero, visit the program's website.

5. USGBC support for additional recommendations included in the draft plan

USGBC concurs with various other recommendations proposed by the Commission – specifically: offering incentives for net-zero energy all-electric new buildings (recommendation 6), leading by example through the electrification and decarbonization of state buildings (7), prioritizing an equitable level of benefits for all Marylanders (8), improved interagency coordination for holistic building retrofits (9), using federal funds for comprehensive retrofits of low-income housing (12), and offering tax credits or other incentives for enhanced energy efficiency in new construction (13).

USGBC appreciates your consideration of our recommendations. Please contact me at ablackwelder@usgbc.org if I can be of assistance.

Sincerely,

Alysson Blackwelder
Project Manager, Advocacy and Policy
U.S. Green Building Council