



February 8, 2021

The Honorable Jamie Long
Chair, House Climate and Energy Finance and Policy
517 State Office Building
St. Paul, MN 55155
E-mail: rep.jamie.long@house.mn

Re: Informational hearing on HF XXXX (Long) Modifying energy code for new commercial buildings

Dear Chair Long and members of the Climate and Energy Finance and Policy Committee:

Thank you for this opportunity to comment regarding bill HFxxx modifying energy code for new commercial buildings. MHP agrees that Minnesota must increase efforts to reduce its carbon footprint and meet its greenhouse gas reduction goals. MHP supports the approach of this bill, which establishes a statewide approach that utilizes familiar tools. MHP notes that this bill would impact the commercial energy code, which applies to residential buildings of 4 stories or greater.

Minnesota Housing Partnership (MHP) works to strengthen development capacity and promotes systems change, serving communities throughout the United States. We provide capacity building for rural and Native communities, produce original research, and advocate for policies that advance affordable housing and strengthen communities. We have worked in dozens of communities across Minnesota, providing direct technical assistance to support housing and community development needs.

MHP is a leadership team member of the **Minnesota Multifamily Affordable Housing Energy Network (MMAHEN)**, the purpose of which is to increase energy efficiency and conservation in multifamily buildings (five units or more) in Minnesota by improving and expanding the use and equitable access of available resources. MMAHEN has grown since 2014 to 64 members representing 39 organizations. MMAHEN's priorities include a focus on under-resourced families, who have the most to gain from deeper investments in energy efficiency in affordable housing. Under-resourced families often spend up to five times more of their income on energy compared to the average household.

MHP appreciates the recommendations from the report of the Minnesota Departments of Labor and Industry and Commerce, "*Improving building energy efficiency in commercial and multi-family construction*" (hereinafter "Report") (December 2020), including utilizing workgroup feedback from experienced practitioners. MHP frequently solicits feedback on energy efficiency and other issues that impact the development process for multi-family affordable housing; we note that many of the recommendations align with feedback we have regularly received from those involved in the affordable development process:

- **Minimize complexity:** For multifamily developers, ensuring new requirements are designed to minimize complexity by utilizing a statewide approach and familiar code framework and enforcement tools, is a high priority. Affordable multifamily building projects are already highly complex, from funding to construction to regulatory compliance. MHP strongly supports the recommended approach, which prioritizes the need to reduce complexity.



- **Resources needed for successful implementation.** The Report acknowledges that resources will be necessary to support implementation. MHP emphasized that these resources must be tailored to meet the needs of building owners and developers, and that ongoing engagement with these stakeholders will be necessary. Needed resources, as mentioned in the Report, can range from direct financial incentives, to education and training, to other types of technical assistance.

In addition, MHP requests that the Department of Labor and Industry and the Department of Commerce work with Minnesota Housing to provide ongoing research on energy efficiency project benefits, costs and efficiencies, including upfront construction costs and renter energy burden; assisting developers with information on the benefits and costs will reduce developer risk and help drive production efficiency.

Thank you for the opportunity to provide comment on HF XXXX (Long) Modifying energy code for new commercial buildings.

Sincerely

A handwritten signature in black ink, appearing to read 'Elizabeth Glidden', with a long, sweeping horizontal stroke extending to the right.

Elizabeth Glidden
Deputy Executive Director and Director of Policy