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Ecosystem commends the Department of Buildings for providing electrical emissions factors for future periods, therefore bringing clarity on the types of retrofits that will lead to compliance. However, we strongly advise against the 2050 zero emissions mandates. It has become apparent that 80 to 95% decarbonization is technically feasible and cost-effective, while the remaining 5% of emissions prove extremely challenging to eliminate in terms of technical feasibility, resiliency, and cost. Therefore, it is likely that setting the objective to zero will lead to less decarbonization, as the path to full compliance will be several magnitudes more complex. Building owners will be far less inclined to undertake deep decarbonization projects if the result is still non-compliance.

On behalf of Ecosystem Energy Services,

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