



**Comments of Darren Port, Building Energy Codes Manager
Northeast Energy Efficiency Partnerships (NEEP)
To the New York State Department of State
August 20, 2014**

Mark Blanke, New York State Department of State:

On behalf of Northeast Energy Efficiency Partnerships (NEEP)¹, thank you for the opportunity to provide comment on New York State's residential building energy code update. NEEP was founded in 1996 as a non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency in the building sector through public policy, program strategies and education. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

NEEP's Building Energy Codes Project helps to increase building energy efficiency in the region by providing technical assistance and resources to support energy code development, implementation, and compliance. We have provided assistance to New York State's building energy code efforts for several years and attended each of last week's public hearings.

Support for Adoption of the 2012 IECC/ASHRAE 90.1-2010

NEEP strongly supports the State of New York's efforts to create a better energy future for its citizens by adopting the 2012 International Energy Conservation Code (IECC)/ASHRAE 90.1-2010 as the basis of its commercial building energy code.

New York stands to benefit from the adoption of the 2012 IECC/ASHRAE 90.1-2010 in many ways:

- By adopting the 2012 IECC/ASHRAE 90.1-2010, the State of New York will stay on track with its energy efficiency goals and will provide benefits to its building and home owners and individual tenants for many years. New construction is the most cost-effective time to install better insulation, quality windows and doors, and efficient heating and cooling equipment that is properly sized. An up-to-date energy code that accounts for the latest in construction practices and technological advances ensures this.
- The adoption of the 2012 IECC/ASHRAE 90.1-2010 will facilitate compliance and enforcement of the code, as many of the provisions are simpler and easier to apply than previous versions. Builders and code officials can take advantage of free trainings, free COMcheck compliance software, and other support programs offered through the U.S. Department of Energy.

¹ [NEEP](http://www.neep.org) is a regional non-profit organization founded in 1996 whose mission is to promote the efficient use of energy in homes, buildings, and industry throughout the Northeast and Mid-Atlantic through regionally coordinated programs and policies that increase the use of energy efficient products, services and practices, and help achieve a cleaner environment and a more reliable and affordable energy system. The comments are presented by NEEP staff and don't necessarily reflect the views of NEEP's Board, sponsors or partners.



Opposition to Weakening Amendments to the 2012 IECC/ASHRAE 90.1-2010

NEEP opposes any amendments to the 2012 IECC/ASHRAE 90.1-2010 that make the code less stringent. Such amendments serve to reduce the energy savings achieved by the model code. That being said, the [proposed amendments](#) are the product of an extensive refinement process, and NEEP supports adoption of the code as presented.

Conclusion

Adoption of the 2012 IECC/ASHRAE 90.1-2010 serves several essential goals:

- Improves the thermal efficiencies of wall, roof, floor and basement construction, and of window and door performance that all combine to lower energy bills and provide healthier environments for owners and tenants of new and renovated buildings within the state;
- Improves thermal performance and corollary air infiltration requirements that reduce loss of energy by structures, thereby reducing the costs for equipment and systems necessary to heat and cool these new buildings and renovated spaces;
- Requires water heating and lighting efficiencies that will serve consumers through additional reductions in their utility bills;
- Will also reduce the need for utilities to construct additional generation and transmission capacity improvements to meet increases in electrical demand.

NEEP wholeheartedly endorses adoption of the 2012 IECC/ASHRAE 90.1-2010 as an essential component of the State of New York's overall energy efficiency goals, and is available to assist in answering inquiries about any aspect of adoption and implementation. Please do not hesitate to contact NEEP for technical support and assistance in this effort.

Contact information:

Darren Port
Building Energy Codes Manager
NEEP - Northeast Energy Efficiency Partnerships
91 Hartwell Avenue, Lexington, MA 02421-3137
781-860-9177 Ext.132
dport@neep.org