



May 12, 2014

VIA ELECTRONIC MAIL

Joseph Hill, R.A.
Assistant Director for Energy Services
New York State Department of State
Division of Building Standards and Codes
One Commerce Plaza
99 Washington Avenue, Suite 1160
Albany, NY 12231

RE: Northeast Energy Efficiency Partnerships (NEEP) Comments in Support of New York State 2012 International Energy Conservation Code Adoption.

Dear Mr. Hill -

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 aims to achieve significant energy savings in new construction, remodeling and renovations through up-to-date building energy codes that meet or exceed national model energy code requirements. The project also strives for energy code compliance throughout the region.

Support for Adoption of the 2012 IECC

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) as the basis of its residential building energy code.

New York and its citizens stand to benefit from the adoption of the 2012 IECC in many ways:

- The 2012 IECC is the final product of a well-developed, long-standing model code development process that involves the nation's leading experts in energy efficiency, building design and product performance professionals, state and local governmental officials, product manufacturers, architects and builders.

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.



- By adopting the 2012 IECC, 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 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 REScheck compliance software, and other support programs offered through the U.S. Department of Energy.

Opposition to Weakening Amendments to the 2012 IECC

NEEP opposes any amendments to the 2012 IECC that make the code less stringent. Such amendments serve to reduce the energy savings achieved by the model code.

Conclusion

Adoption of the 2012 IECC 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 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 IECC adoption and implementation. Please do not hesitate to contact NEEP for technical support and assistance in this effort.

Sincerely,

Darren Port

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