



Ed Landon
Director, Codes Administration
Department of Housing and Community Development
100 Community Place
Crownsville, MD 21032
landon@mdhousing.org

RE: NEEP's Comments in Support of MD Adoption of the 2012 IECC and 2012 International Codes

Dear Mr. Landon,

Northeast Energy Efficiency Partnerships (NEEP) strongly supports the Department of Housing and Community Development (DHCD) proposal to update the Maryland Building Performance Standards (MBPS) to reference the 2012 International Code Council (ICC) codes series, including the 2012 International Energy Conservation Code (2012 IECC), as detailed in the notice of proposed action¹ issued on September 7, 2011 and published in the Maryland Register on September 23, 2011.

This action will maintain Maryland's standing as a national leader in sensible and efficient building practices and the effective use of energy. It will also keep the state in compliance with state statutes governing the MBPS and the process to regularly update them.

NEEP 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.

NEEP has a long history of working on energy efficiency policies and programs in the state of Maryland, dating back a decade, when we worked with the Public Service Commission and a number of other organizations to help provide a framework for ratepayer funded energy efficiency programs. From 2003 through 2007 NEEP worked through a U.S. Department of Energy grant hosted by the Maryland Energy Administration (MEA) to conduct building energy code training. We have also been privileged to have worked closely with the MEA and a number of other stakeholders on setting minimum appliance efficiency standards for Maryland, beginning in 2003, when Maryland became the first state in the region to adopt a new set of state-based appliance standards, continuing in 2007, when a second new appliance standards package was adopted. Most recently, we provided training on building energy codes to the city of Rockville, and we continue to work with state and utility officials on a regional project hosted by NEEP to develop common protocols for the evaluation, measurement and verification of energy savings from state-based programs.

Support for Adoption of the 2012 IECC

As a major part of this proposed comprehensive codes package update, 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.

The benefits of these code changes will be immediate and continuing savings for both businesses and residences throughout the state. They also will hold down the increasing costs of energy from higher demand that would occur if not adopted, and reduce continued reliance on older and more expensive power generators, a leading contributor to high energy bills in our mid-Atlantic and Northeast states.

NEEP has offered only a single proposed changeⁱⁱ in the 2012 IECC that will clarify the inspections sequencing for air sealing and insulation. It is intended to reduce probable errors and additional contractor expenses for fixing problems more likely to occur in following current inspection procedures. This revision has already been adopted into the new Vermont Residential Building Energy Standards (RBES) that are based on the 2009 IECC.

Opposition to Weakening Amendments to the 2012 IECC

NEEP also 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 and are inconsistent with Maryland law.

The relevant 2009 statute governing Maryland's Building Performance Standards requires that DHCD adopt the latest edition of the IECC within 12 months of publication of the new code editions.ⁱⁱⁱ The 2012 IECC was published in July 2011. DHCD may not adopt energy conservation requirements that are less stringent than the IECC.

Conclusion

Comprehensive, unified codes adoption reduces the expenses associated with constructing buildings and assures that the adopted health, safety and welfare requirements work in concert to bring safe, healthy and efficient buildings and building renovations into Maryland's towns, cities, and counties now and into the future.

The 2012 ICC compendium of building and energy codes proposed for adoption by the Department is an important step in Maryland's leadership in providing the best regulatory protection for their residents and businesses. NEEP commends the DHCD and Ed Landon in bringing this code change forward, and endorses the entire effort.

NEEP wholeheartedly endorses the inclusion of the 2012 IECC as an essential component of Maryland's overall codes adoption, and is available to assist in answering inquiries about any aspect of IECC.

Sincerely,

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ⁱ http://www.mdhousing.org/Website/SmartCodes/2012_Codes_Hearings_Notice.pdf

ⁱⁱ http://neep.org/uploads/NEEPResources/id795/T402%204%202%20Code%20Chg_EC81_AirSealing_Insulation.pdf

ⁱⁱⁱ Maryland SB 625 (2009). <http://mlis.state.md.us/2009rs/billfile/SB0625.htm>