



Department of Natural Resources and Environmental Control- Division of Energy and Climate
1203 College Park Drive, Suite 101
Dover, DE 19904

RE: January 6, 2014 Public Hearing - Comments in Support of Delaware Adoption of 2012 IECC (SAN #2013-27)

Dear Energy Efficiency Program Manager Nagyiski,

Northeast Energy Efficiency Partnerships (NEEP) strongly supports Delaware's efforts to create a better energy future for its citizens by adopting the 2012 International Energy Conservation Code (IECC).

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 is one of six Regional Energy Efficiency Organizations (REEOs) designated by the U.S. Department of Energy to work collaboratively with them in linking regions to DOE guidance and products.

Support for Adoption of the 2012 IECC

Delaware 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, including representatives from Delaware.
- By adopting the 2012 IECC, Delaware will stay on track of 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. Construction costs should be reduced through economies of scale, as suppliers and retailers reduce inventories and streamline production to meet these new energy targets.
- 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, COMcheck and REScheck compliance software, and other programs through the Department of Energy.

NEEP has offered only a single proposed change in the 2012 IECC that will clarify the inspections sequencing for air sealing and insulation. NEEP recommends the air sealing requirements checklist to be divided off from insulation installation to permit inspection/testing when it is possible to easily identify leaks and make corrections, before installing the 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 Delaware law.
- In particular, NEEP opposes further weakening the proposed building air leakage amendment (4.1.3), which has been the most contested code provision in the adoption process. The amendment responds to the concern that achieving the maximum air leakage limit is more difficult for small homes due to the way the air leakage metric (air changes per hour) is computed. A HERS rating method was previously bundled with the tiered air leakage requirements as a means of recapturing some of the lost energy savings elsewhere in the home.

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.

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 wholeheartedly endorses adoption of the 2012 IECC as an essential component of Delaware'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,

A handwritten signature in black ink, appearing to read 'K. Rose', with a horizontal line extending to the right.

Kevin Rose
Building Energy Technical Associate
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