



Gabrielle N. Gallagher
Department of Community Affairs
State of New Jersey
PO Box 800
Trenton, New Jersey 08625

RE: Comments in Support of Proposal to Update New Jersey State Building Code

Northeast Energy Efficiency Partnerships (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's Building Energy Codes Project, one of NEEP's oldest initiatives, helps the region to increase building energy efficiency by providing technical resources and assistance to states to develop, implement, and comply with building energy codes.

Support for Adoption of 2015 IECC / ASHRAE 90.1-2013

NEEP strongly supports the State of New Jersey's efforts to create a better energy future for its citizens by proposing to adopt the 2015 International Energy Conservation Code (IECC) and ASHRAE Standard 90.1-2013 as the foundational documents for its 2015 Energy Subcode update. NEEP applauds the Department of Community Affairs for recognizing energy codes as a cost-effective source of long-term energy savings.

New Jersey and its citizens stand to benefit from this code adoption in many ways:

- The 2015 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.
- By adopting 2015 IECC / ASHRAE 90.1-2013, the State of New Jersey will stay on track with its energy efficiency goals and provide benefits to its building and home owners and 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. The increase in construction costs should be reduced over time through economies of scale, as suppliers and retailers reduce inventories and streamline production to meet these new energy targets.
- The adoption of 2015 IECC / ASHRAE 90.1-2013 will facilitate compliance and enforcement of the code since many of the provisions are simpler and easier to apply than previous versions. Builders and code officials can take advantage of free resources, REScheck and COMcheck compliance software, and other programs through the Department of Energy.



Opposition to Weakening Amendments to the 2015 IECC

While NEEP appreciates the large increase in energy savings inherent in the proposed adoption, NEEP opposes any amendments to the 2015 IECC that serve to reduce the energy savings achieved by the model code. The following two amendments will have the most notable impact:

- *Air leakage testing requirement:* Making the blower door testing requirement optional leaves no definitive mechanism for assuring the air tightness of a particular home, as visual inspection is not adequate to measure air leakage. The blower door test assures quality construction and protects consumers from being saddled with elevated utility bills. New Jersey has a substantial number of Energy Star rated homes, including all state financed affordable housing, indicating that there is a robust energy rater community that can assure ratings are conducted properly and in a timely manner.

If the 2015 IECC limit of 3 ACH-50 has been deemed too stringent, we would prefer alternatives to making the blower door test strictly optional. NEEP suggests retaining the mandatory testing requirement but incorporating a phased in approach (e.g. limit not enforced until six months after the code effective date) or a slightly relaxed tightness requirement (e.g. 4 ACH-50, or concessions for smaller multi-family units). NEEP would be happy to discuss alternative methods for adjusting the air leakage testing requirement that have been developed for other states.

- *Requirements for existing homes:* One of the major potential benefits of adopting the 2015 IECC instead of the 2012 IECC is the streamlined existing building sections, which have been added to clarify requirements for these buildings. While the Rehabilitation Subcode was written to meet the specific needs of the state, it is worth noting that New Jersey stands to leave potential real energy savings on the table that may have been attained through improved levels of compliance for existing building projects.

Conclusion

Adoption of 2015 IECC / ASHRAE 90.1-2013 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;
- Reduces the need for utilities to construct additional generation and transmission capacity improvements to meet increases in electrical demand.

Weakening amendments notwithstanding, NEEP wholeheartedly endorses adoption of 2015 IECC / ASHRAE 90.1-2013 as an essential component of the State of New Jersey's overall energy efficiency goals and is available to assist in answering inquiries about any aspect of building energy code 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
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