



Barry Murphy
Public Service Department
State of Vermont
112 State Street Third Floor
Montpelier, VT 05620-2601

RE: Comments in Support of Proposals to Update Vermont 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 the 2015 IECC (and Development of Stretch Codes)

NEEP strongly supports the State of Vermont's efforts to create a better energy future for its citizens by proposing to adopt the 2015 International Energy Conservation Code (IECC) as the foundational document for its 2014 Residential and Commercial Building Energy Standards ([RBES](#) and [CBES](#)). NEEP applauds the Public Service Department for recognizing energy codes as a cost-effective source of long-term energy savings.

Vermont and its citizens stand to benefit from the adoption of the 2015 IECC 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 the 2015 IECC, the State of Vermont 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 the 2015 IECC 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, COMcheck and REScheck compliance software, and other programs through the Department of Energy.

Opposition to Weakening Amendments to the 2015 IECC

NEEP opposes any amendments to the 2015 IECC that serve to reduce the energy savings achieved by the model code. The following amendments proposed in the draft 2014 RBES are particularly impactful:



- *Air leakage testing requirement:* Amending blower door testing out of the [non-Fast Track] prescriptive path of the state's new residential code is an unnecessary concession—a sentiment that was shared by many attending the June 25 Windsor stakeholder workshop. Blower door testing has already permeated the state's code through the HERS alternative; furthermore, mandatory air leakage testing could yield additional energy savings by serving as a gateway to greater enrollment in Efficiency Vermont's above-code programs. If the 2015 IECC limit of 3 ACH-50 has been deemed too stringent, NEEP suggests retaining at least the mandatory testing requirement and incorporating a phased in or slightly relaxed tightness requirement for all homes. NEEP would be happy to discuss alternative methods for adjusting the air leakage testing requirement that have been developed for other states.
- *Energy Rating Index (ERI) thresholds:* By setting the 2015 IECC ERI threshold of 54 as the state's proposed Stretch Code threshold and inflating the proposed 2014 RBES threshold to 60, Vermont may upset the balance of the different code pathways. In addition, Vermont stands to serve as a national leader as perhaps the first state to adopt the newest and most efficient model code. Increasing these ERI figures would somewhat tarnish this precedent, though, as this change will be cited by those endeavoring to weaken future state adoptions of the 2015 IECC. Instead, NEEP recommends lowering the RBES threshold closer to the original figure of 54 and adjusting the Stretch Code limit to maintain the proposed 6 point difference.

Conclusion

Adoption of the 2015 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;
- 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 the 2015 IECC as an essential component of the State of Vermont'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
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