



November 22, 2019

Secretary Garvin  
The Department of Natural Resources and Environmental Control (DNREC)  
Division of Climate, Coastal & Energy  
89 Kings Highway, Dover, DE 19901  
Delivered Via Email To: [DNRECHearingComments@delaware.gov](mailto:DNRECHearingComments@delaware.gov)

Re: Proposed amendments to 7 DE Admin. Code 2101 *Regulations for State Energy Conservation Code*

Dear Secretary Garvin:

Thank you for the opportunity to provide comments regarding the Division's proposed amendments to 7 DE Admin. Code 2101 *Regulations for State Energy Conservation Code*. The American Chemistry Council (ACC) and its members support the Division's proposed rule that adopts the 2018 IECC and ASHRAE 90.1-2016 without weakening amendments.

#### **ACC is an Important Stakeholder**

ACC represents more than 170 leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer.

The decisions of the Department of Natural Resources and Environmental Control impact ACC's members and their employees. The chemical industry supplies many products and materials to the building and construction value chain, including those that deliver energy efficiency throughout the entire structure. ACC's members are also large users of energy so the responsible use of energy is important to the industry's economic health and competitiveness. Energy efficiency is the lowest cost option for meeting energy demand. Energy efficient buildings create economic opportunities for businesses and industry by promoting new energy efficient technologies and reducing energy waste.

#### **ACC Supports the 2018 IECC without Weakening Amendments**

The chemical industry supports the adoption of the 2018 IECC and ASHRAE 90.1-2016 as the Delaware State Energy Code. We are pleased to see that Delaware is adopting the model codes in their entirety and not implementing any weakening amendments to the substantive requirements for energy efficiency.

As discussed in our November 2, 2018 letter, as manufacturers, we know a strong energy code with the flexibility of many equally strong compliance paths will unleash the power of competition without picking winners or losers. For example, the proposed R-values and U-factor requirements are constructible with various products and combinations of products. For homebuyers who must maintain the home and pay for its utility and operational costs, features that reduce maintenance and utility bills are critically important. Reduced energy bills quickly repay the cost of improving energy efficiency.

#### **Many Technical Resources Are Available to Help**

As Delaware moves to implement the new code, various third-party resources are available to support code compliance with helpful practices for construction. For example, ACC's Foam Sheathing Committee supports the technical information for builders on [www.continuousinsulation.org](http://www.continuousinsulation.org), and ACC's Spray Foam



Coalition has excellent resources at <https://polyurethane.americanchemistry.com/polyurethanes/Spray-Foam-Coalition/>.

Available resources provide a variety of actionable and code-compliant solutions to optimize moisture control, integrate various wall functions and components, and equip builders/designers with conventional or more advanced options for resilient, energy efficient performance. Thus, as with many forms of construction (including conventional framing, advanced wood framing, SIPs panels, ICF forms, etc.) there are significant resources available to support not just one but many reasonable options.

Thank you for the opportunity to offer our comments. For any questions, please do not hesitate to contact me at (202) 249-6223 or via email at [Josh\\_Young@americanchemistry.com](mailto:Josh_Young@americanchemistry.com). ACC, its member companies and our employees thank you in advance for considering our views.

Sincerely,

Josh Young  
Senior Director, Government Affairs  
State Affairs and Political Mobilization  
American Chemistry Council

