



December 18, 2019

DNREC Hearing Officer
89 Kings Highway
Dover, DE 19901

Subject: Official Comment on Proposed 2018 Regulation for State Energy Conservation Code

The Builders and Remodelers Association of Delaware does not support the adoption of the 2018 International Energy Conservation Code (2018 IECC) in its current form. Our organization understands the importance of preserving energy and making homes as efficient as possible, but we believe this should be done in a sensible fashion with input from all stakeholders. An inclusive process with stakeholders has been meeting for years and their work and recommendations should be incorporated into the final regulation.

Delaware currently follows the 2012 IECC, which our organization fully supports and had the opportunity to propose amendments to be included in the code. These proposed amendments were adopted. As experts in the Delaware home building industry, we believe our input is not only necessary, but vital to the success of this critical industry. We urge you to consider the following amendments, which have already been thoroughly discussed, to the proposed regulation:

- **Allow for panned ducts in the thermal envelope:** The cost of switching to 1-panned return systems will vary significantly as it will require homes to be designed with a location for a central return instead of using an available cavity to direct the return air. We propose an amendment that would allow for panned ducts within the thermal envelope. By keeping it within the thermal envelope we negate energy lost by using the framing cavities, this will allow home builders the flexibility to design homes in the most efficient manner.
- **Add the words “larger than” before the ¾”, instead of it saying ¾” and larger where it currently states “2-Pipe insulation on piping ¾ of an inch and larger”:** For builders that are using a manifold system, this would only require insulation on the area between the manifold and the water heater. Typically, costs are relatively low for the manifold system and the plumbing code already enforces this. Builders that use a traditional tee and branch system will see a much greater cost impact. This would require their entire ¾” main hot line to be insulated, significantly increasing costs to consumers. Our recommendation is to add the words “larger than” before the ¾”, instead of it saying ¾” and larger. Therefore, only water pipes over ¾ would need to be insulated.
- **Flexibility for air leakage when coupled with other energy improvements:** During the adoption process of the 2012 IECC, amendments were included that allowed smaller homes to have a higher leakage rate, but offset the energy loss with other improvements. A home with 2,000

square feet of conditioned floor area, including basements, is not affected by this change. This code will have a significant negative impact on builders constructing small homes that are built on concrete foundations. This amendment will simply give builders a way to make up for the energy lost during a poor blower door test. In a time when the government is focused on affordable housing, we should not be increasing the costs of smaller homes.

As stated above, input from the council formed by Department of Natural Resources and Environmental Control (DNREC) to analyze the 2018 IECC, comprised of builders, code officials from all three counties, DNREC employees, insulators, and energy raters, should be acknowledged while adopting the code. After months of discussion by the knowledgeable council members, the comments and feedback put forth by the council were completely disregarded. As experts in various backgrounds, all vital to the energy code, we request our input be included when adopting the 2018 International Energy Conservation Code.

Thank you,

Mark Gandy
President
Builders and Remodelers Association of Delaware