



DE 2018 IECC / ASHRAE 90.1-2016 Unamended Adoption 2DEC2019

December 2, 2019

Theresa L. Newman, Hearing Officer Office of the Secretary
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway
Dover, DE 19901

RE: In Support of Proposed Adoption of Unamended 2018 IECC and ASHRAE Standard 90.1-2016

Dear Ms. Newman,

The Northeast Energy Efficiency Partnerships (NEEP) supports Delaware's Department of Natural Resources and Environmental Control proposed unamended adoption of the residential and commercial provisions of the 2018 IECC and ASHRAE Standard 90.1-2016. Updating Delaware's building energy codes provides enhanced economic, health, and life safety benefits for Delaware's citizens and businesses. Lower building energy costs keep dollars in communities and promote local neighborhood vitality.

Both the 2018 IECC and ASHRAE 90.1-2016 will increase the state's building efficiency through more efficient windows, a tighter building envelope, increased lighting efficiency, and better testing protocols. The inclusion of the latest building technologies and materials in code promotes state energy and green job growth. Various code compliance path options provide maximum flexibility for builders. Additionally, the codes clarify and refine numerous technical and administrative provisions making compliance simpler for state and local code officials to administer.

Unamended verse Weakening Amendments

Delaware's unamended adoption of the 2018 IECC and ASHRAE 90.1-2016 without weakening amendments is paramount to ensure that homeowners receive the energy, cost-saving, health, and safety benefits of the latest energy codes.

The 2018 IECC and ASHRAE 90.1-2016 are the final products of well-developed, long-standing model code and standard 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. Building codes are developed to be adopted and complied with as published. Amending the code - particularly with weakening code provisions - has detrimental consequences. Weakening the code makes the code less cost-effective to implement, disrupts potential valuation savings, causes confusion in the real estate market and among design professionals, and reduces the code's overall power to act as a driver toward further energy efficiency, carbon reduction, and market transformation.

Delaware's proposal to adopt unamended will assure the minimum national model code efficiency of homes and buildings throughout the state. By adopting the codes unamended, Delaware affirms its commitment to the state's climate goals.



DE 2018 IECC / ASHRAE 90.1-2016 Unamended Adoption 2DEC2019

In Conclusion

Overall, NEEP definitively supports Delaware’s adoption of the 2018 *IECC* and *ASHRAE 90.1-2016* unamended. NEEP further encourages the state to seek options for deeper energy savings and climate change mitigation through the adoption of stretch codes and zero energy codes.

We are available to offer our assistance and experience in energy code adoption and implementation as you consider the options to maximize building energy efficiency. Please contact me you have any questions or would like to discuss how NEEP can be of support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darren Port', with a stylized flourish at the end.

Darren Port

NEEP - Northeast Energy Efficiency Partnerships
81 Hartwell Avenue, Lexington, MA 02421-3137
781-860-9177 Ext.132

dport@neep.org

www.neep.org

Northeast Energy Efficiency Partnerships (NEEP) is a regional non-profit organization whose mission is to accelerate regional collaboration to promote advanced energy efficiency and related solutions in homes, buildings, industry, and communities.

NEEP’s Buildings and Community Solutions Team supports the region to increase building energy efficiency by providing technical resources and assistance to states to develop, implement, and comply with building energy codes, among other energy initiatives.