



December 18, 2019

Theresa Newman
Office of the Secretary
Department of Natural Resources and Environmental Control
89 Kings Highway
Dover, DE 19901

Re: Docket #2019-R-CCE 0020

Dear Ms. Newman:

I submit these comments on behalf of New Ecology, Inc. (NEI), a non-profit organization with a mission to catalyze community-based sustainable development and bring its benefits to underserved populations. We work locally to address global environmental and equity issues, providing technical services to advance environmental, social, and economic equity. Specifically, we support low-income populations by making new and existing affordable housing efficient, durable, resilient, and healthy.

In Delaware, NEI has the honor to partner with the Delaware Sustainable Energy Utility (DESEU) to manage the Energize Delaware Affordable Multifamily Housing Program, which provides a variety of financial and technical resources to support higher energy performance in this critical housing sector. It should be noted that NEI's comments here reflect our organizational perspective and not those of the DESEU or the Energize Delaware program.

NEI supports Delaware's adoption of the 2018 International Energy Conservation Code (IECC) and the latest American Society of Heating Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2016 without amendment.

We expect that one of the most-discussed topics in this code adoption process is that of air infiltration and air leakage testing. On that point, NEI wishes to leverage its experience as an active provider of energy consulting and HERS Rater services in Delaware and other states in the Mid-Atlantic and New England. We work with project teams from project conception through design to completion of construction and we see the challenges and opportunities to improve the energy performance of our buildings.

It is true that meeting the stricter air tightness thresholds specified in the 2018 IECC model code is more challenging, particularly for smaller homes and apartments. We do note that other jurisdictions have considered alternatives to the air tightness thresholds, such as achieving ENERGY STAR certification, a certain HERS score, or different metrics, such as surface-area based infiltration requirements (CFM50 per square foot of shell area) instead of the volume-based ACH50 metric. However, achieving the standard in the model code is possible and we encourage Delaware to aim high, especially given the state's objective to achieve net-zero energy buildings in the relatively near future.



Additionally, we encourage the state to think and act strategically about providing sufficient support for code enforcement and training for relevant parties. Specifically, we recommend that the state allocate training resources for code officials, designers, HERS Raters, contractors, and others to expand the capacity and collaboration among Delaware's vibrant and capable workforce. Design and construction professionals will need support through a transition to a more rigorous code and code enforcement is critical to ensure the intent is realized.

Thank you for your consideration of NEI's comments.

Regards,

Patrick Coleman
Delaware Regional Manager