



International Code Council
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December 3, 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: RECA Comments Supporting Proposed Adoption of Unamended 2018 IECC and ASHRAE Standard 90.1-2016

Dear Ms. Newman,

The International Code Council (ICC) is a U.S.-based, member-driven organization of professionals who are committed to protect the health, safety and welfare of people by creating safe buildings and communities. Our members represent more than 22,000 federal, state, local, tribal, special district and similar jurisdictions in the United States.

On behalf of the Code Council's 64,000 members I write to convey our support for the proposed amendment to 7 DE Admin. Code 2101, which would adopt the 2018 International Energy Conservation Code (2018 IECC) and the American Society of Heating, Refrigerating and Air-Conditioning Engineers Standard 90.1-2016 (ASHRAE 2016) as the statewide energy conservation code in Delaware.

The 2018 IECC was developed through consensus-based procedures that involve any and all interested and affected stakeholders, including manufacturers, users, and representatives of government and academia. The result is a model energy code that directly benefits consumers, businesses, and taxpayers through cost savings, reduced energy use, and lower carbon emissions.

Currently, Delaware uses the 2012 IECC. The adoption of our most up to date energy code would provide the cost saving and energy benefits of two full code development cycles. The difference in

energy savings alone between the 2015 IECC and the 2018 IECC is considered by the U.S. Department of Energy to be 2.22%. These energy savings would be realized in Delaware as lowered utility bills and carbon emissions.

ICC firmly supports Delaware's adoption of an up to date energy code. We believe that this code will create positive impacts for owners and residents. I would like to personally offer any assistance from ICC as needed regarding adoption and implementation as Delaware works to adopt the 2018 International Energy Code. If you should have any questions please contact your ICC regional representative, Jacob Karson, at (202) 570-1334 or by email at jkarson@iccsafe.org.

Warm Regards,

A handwritten signature in black ink that reads "Sara C. Yerkes". The signature is written in a cursive, flowing style.

Sara C. Yerkes
Senior Vice President,
Government Relations