



July 11, 2025

Attention: DNREC Hearing Officer
DNREC – Office of the Secretary
89 Kings Highway
Dover, DE 19901
DNRECHearingComments@delaware.gov

Re: Docket #2025-R-OTS-0010
State Energy Conservation Code Regulation update

Dear Secretary Patterson,

We write to in support of the proposal of the State Energy Office to amend 7 DE Admin. Code 2101 Regulations for State Energy Conservation Code to adopt the 2024 International Energy Conservation Code (IECC) with zero net energy capable amendments for residential buildings and the ANSI/IES/American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2022 with amendments for commercial and high-rise residential buildings.

The IECC is a model building code that provides minimum design and construction requirements for energy efficiency. ASHRAE 90.1-2022 offers minimum energy-efficient requirements for the design, construction, operation, and maintenance of buildings and sites and their utilization of on-site renewable energy resources.

Rhode Island was the first state in the nation to adopt the 2024 IECC for new and renovated buildings, which is expected to reduce building energy usage by 8 to 12% and requires "electric readiness," ensuring that building owners can easily add electric vehicle charging, solar, heat pumps and other technologies later on.

By adopting the 2024 IECC, Delaware can also significantly reduce the long-term energy costs for its residents, fostering greater affordability and financial stability. Additionally, this code will enhance the quality, durability, and performance of buildings, increasing their asset value and contributing to more sustainable, energy-efficient communities for years to come.

We commend the State for its ongoing commitment to resilience and equity through the adoption of the latest IECC. We support this important step and look forward to collaborating in efforts to enhance public health and welfare, while delivering long-term cost savings for both residents and businesses.

Best regards,

A handwritten signature in blue ink, appearing to read "Brennon J. Bickel".

Brennon J. Bickel, AIA
Government Affairs Committee Chair