



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

Re: Docket #2025-R-OTS-0010

Dear Secretary Patterson,

Thank you for the opportunity to submit comments to support Delaware's code adoption process (Regulation #2101: Regulations for State Energy Conservation Code) on behalf of Green Building United. The State of Delaware has an opportunity to be a leader in the region by considering the 2024 International Energy Conservation Code (IECC) for adoption, and we welcome the opportunity to participate in the process.

Green Building United would like to express our strong support for Delaware to adopt the 2024 International Codes, as amended by the Department of Natural Resources and Environmental Control.

The International Codes are developed and voted on by a diverse group of professionals that include experts from government and industry professionals. The open and transparent consensus process ensures that the outcome reflects the best technology, materials, and practices that the market can bear. They are widely used throughout the United States, helping provide consistency for the architects, engineers, and contractors that work across jurisdictions.

Opportunities for Success

- **Education and Training.** We urge the State to provide robust education and training.
 - Focus on Small-Medium Homebuilders. While large and high-end builders and contractors often have internal resources to learn new code requirements and adjust plans, documentation, and practices, Delaware needs to prioritize providing training so ALL builders and contractors in the state understand the code changes and compliance requirements.

- Focus on Local Code Officials. Code enforcement in Delaware occurs at the local jurisdiction level. Local building officials need robust education and training to understand the new requirements and learn proper enforcement and compliance checking procedures. Successful implementation will require time and resources, including comprehensive education and training to support code enforcement.
- Green Building United and our members are available to support Delaware to be successful in its implementation of the 2024 IECC codes.

Technical Language Alignment

- Section R407.2.1 - 2E should read 'Phius 2021 Certification guidebook (or newer)', to be consistent with the rest of the document.

Conclusion

Delaware has an exciting opportunity to lead the region in modern energy code adoption with the adoption on the 2024 IECC, reducing the long-term energy burden for Delaware residents and improving the quality, asset value, and performance of buildings for prospective buyers. We appreciate your consideration of our comments and welcome any additional questions.

Thank you,

Emily Pugliese
Policy and Program Director
Green Building United

Green Building United is an independent 501(c)(3) nonprofit organization. Our mission is to advance an equitable transition to a climate- friendly and healthy built environment through education, advocacy, and strategic initiatives. Our region includes the greater Philadelphia area, Lehigh Valley, and the State of Delaware. Our community is made up of architects, engineers, policy makers and advocates, landscape architects, marketing and communications professionals, developers, contractors, building managers, building operators, government workers, and more. Green Building United's stakeholders share a common interest in green building and sustainability, and knowledge levels range from novice to expert.