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July 29, 2025

Gregory Patterson

Secretary

Delaware Department of Natural Resources and Environmental Control

89 Kings Highway SW

Dover, DE 19901

Re: Support for Adoption of the 2024 IECC Without Amendments or Appendices

Dear Secretary Patterson,

On behalf of the Associated Builders and Contractors of Delaware (ABC Delaware), I respectfully urge the Department to adopt the 2024 International Energy Conservation Code (IECC) **without amendments or costly appendices**. This approach aligns with ABC's commitment to **fiscal responsibility, free enterprise, and balanced, data-driven policymaking**.

ABC Delaware strongly supports reasonable progress toward energy efficiency. However, the Department's current proposal—to reduce the Energy Rating Index (ERI) to 42 and adopt additional appendices—**goes beyond the national model code without clear justification, cost-benefit analysis, or stakeholder collaboration**. These additions would increase the cost of a new home by \$15,000–\$20,000 or more, with no assurance of return on investment, while placing a heavy burden on homebuyers, builders, and the skilled workforce that powers our industry.

At a time when **housing affordability and workforce housing availability are in crisis**, we cannot afford to push policies that unintentionally **exclude thousands of Delaware families from homeownership**. Every \$1,000 in added cost prices out approximately 600 Delawareans. As local governments simultaneously raise impact fees, our industry is being forced to pass these costs onto homebuyers—undermining community growth and economic mobility.

Adopting the **base 2024 IECC with an ERI of 53** is a **responsible and value-aligned compromise**:

- It advances Delaware's legislative goal for "net zero energy capable" homes by the end of 2025.
 - It promotes energy efficiency (~50% improvement over average existing homes) without crippling housing supply.
 - It provides predictability for builders and design professionals, reducing the risk of project delays and re-engineering costs.
 - It keeps Delaware competitive as one of the early adopters of the 2024 IECC.
- ABC Delaware also believes that regulatory changes must be developed in partnership with the industry and **grounded in merit and evidence—not**

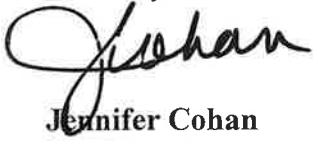
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mandates that disregard the economic and workforce realities on the ground. Our members believe in building stronger communities through smart, sustainable construction, but we also know that sustainability must be **attainable.**

We urge DNREC to stand with Delaware builders, businesses, and families by adopting the 2024 IECC **as written.** Let us work together—through open dialogue and shared goals—to shape the next phase of energy policy in a way that **honors both our environmental and economic responsibilities.**

Sincerely,

A handwritten signature in black ink, appearing to read "J. Cohan", written over a light blue circular stamp.

Jennifer Cohan

President

Associated Builders and Contractors of Delaware