



Date: July 22, 2025  
To: Delaware Dept. of Natural Resources and Environmental Control  
From: Kellie Terranova  
Re: Opposition to Proposed Amendments to the Delaware State Energy Conservation Code

To Whom It May Concern,

I am writing to express my strong opposition to the proposed changes to the Delaware Statewide Energy Code, set to take effect January 1, 2026. While I recognize the importance of energy efficiency and sustainable development, the proposed amendments—which go well beyond the 2024 International Energy Conservation Code (IECC)—present significant concerns related to affordability, feasibility, and the broader economic impacts on Delaware’s housing market.

According to estimates from the National Association of Home Builders (NAHB) and the Home Builders Association of Delaware (HBADE), compliance with the proposed code changes could increase the cost of new home construction by \$15,000 to \$30,000 per unit. These added costs would inevitably be passed on to homebuyers, further straining an already fragile housing market and putting homeownership out of reach for many Delawareans.

At a time when housing affordability is at historic lows and mortgage rates remain elevated, this proposal risks exacerbating a growing crisis. First-time homebuyers, low- and moderate-income families, and those already struggling with housing access will be disproportionately affected.

Additionally, these aggressive energy code revisions would place an unnecessary burden on local builders and tradespeople, requiring rapid adjustments in design, materials, and labor without adequate transition time or cost offsets.

For these reasons, I urge DNREC to instead adopt the base 2024 IECC code without additional amendments. This approach balances progress in energy efficiency with a practical, market-conscious strategy that supports both environmental and economic sustainability.

Thank you for the opportunity to provide public comment. I hope the concerns of industry professionals, homeowners, and stakeholders will be carefully considered before any final decision is made.

Thank you,

*Kellie Terranova*

Kellie Terranova | Chief Financial Officer, VP of Operations

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