

Submitted Via Email

December 22, 2025

Theresa Smith, Hearing Officer  
Delaware Department of Natural Resources and Environmental Control  
Office of the Secretary  
89 Kings Highway  
Dover, DE 19901

**RE: RECA Comments Supporting the Adoption of the 2024 *International Energy Conservation Code* as the Delaware Building Energy Conservation Code**

Dear Ms. Smith,

The Responsible Energy Codes Alliance submits these comments in response to the proposed adoption of the 2024 *International Energy Conservation Code (IECC)* and *ASHRAE Standard 90.1-2022* as the Delaware Building Energy Conservation Code, as noticed in the December 1, 2025 Delaware Register.<sup>1</sup> We continue to support the adoption of the 2024 *IECC* as the foundation for a range of energy efficiency, resiliency, and environmental benefits for the owners and occupants of buildings in Delaware.

Although RECA does not generally oppose the two appendices included in the revised proposal, our recommendation remains focused on the value of using the framework of the 2024 *IECC* to meet the efficiency goals established by the General Assembly.<sup>2</sup> The 2024 *IECC* is cost-effective, will reduce energy use and emissions, and will provide long-term benefits to building owners in Delaware. Consistent with our comments submitted on August 5, 2025, we recommend that the Department adopt the 2024 *IECC* as a minimum efficiency standard, with additional improvements the Department deems necessary to comply with state statutes. A copy of our August 5, 2025 comments are appended to this letter. Please contact us if you have any questions or would like to discuss how RECA can be of assistance.

Sincerely,

Eric Lacey  
RECA Chairman

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<sup>1</sup> See 29, Del. Reg. Regs. 29 (Dec. 1, 2025).

<sup>2</sup> 16 Del.C. §§ 7605, 8004, & 8005.

