

Subject: New Proposed Energy Regulations
Date: Friday, December 19, 2025 at 10:47:40 AM Eastern Standard Time
From: Sonya Starr
To: HearingComments, DNREC (MailBox Resources)
Attachments: Outlook-4iyn42f3.png

December 19, 2025

Dear Theresa Smith,

The Delaware Affordable Housing Coalition (DAHC) appreciates the Department's commitment to energy efficiency and sustainability. However, we strongly urge DNREC to allow an exemption to the EV requirement for affordable housing units or provide subsidies to cover the additional cost.

The DAHC represents nonprofit organizations serving low-income households, including affordable housing developers. As the National Low Income Housing Coalition's 2024 *Gap Report* indicates, Delaware has only **41 affordable and available units for every 100 extremely low-income households**. We are in the midst of a severe affordable housing crisis.

Affordable housing development is already financially prohibitive. The requirement mandating that each new residential unit have an electric vehicle ready parking space with a branch circuit and outlet capable of supporting EVSE installation – further increase costs without providing meaningful benefit to most residents. The reality is that **many residents in affordable housing do not own a car, let alone an electric vehicle**. These regulations will burden affordable housing providers with substantial additional costs that are not supported by any federal funding, which has now been eliminated.

Therefore, **we respectfully request** that there be an exemption for all apartments that provide housing for households making 80% or less AMI or homeownership at 120% AMI or below or sufficient subsidies to cover the cost.

We stand ready to work collaboratively with DNREC and other stakeholders to achieve energy efficiency and decarbonization goals in ways that do not exacerbate Delaware's housing crisis or place additional burdens on the state's most vulnerable residents.

Respectfully,

Better Homes of Seaford

Central DE Habitat for Humanity

Cinnaire

Cornerstone West

DE Federation of Housing Counselors

DE-NAHRO

Diamond State Community Land Trust

Habitat for Humanity of New Castle County

HDC MidAtlantic

Housing Alliance Delaware

Luther Towers

Milford Housing Development Corporation

NeighborGood Partners

Peoples' Place

REACH Riverside

Sussex County Habitat for Humanity

Todmorden Foundation

Westend Neighborhood House

Respectfully,

Sonya

Rabbi Sonya Starr

She/Her/Hers

Policy Director

[Housing Alliance Delaware](#)

(302)654-0126 ext. 103



