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August 6, 2025

Ms. Anna Keating  
Energy Policy Analyst  
Delaware Department of Natural Resources and Environmental Control  
Division of Climate, Coastal and Energy  
99 Kings Highway  
Dover, DE 19901

Submitted via email

RE: DOCKET # 2025-R-CCE-0008 - 2101 Regulations for State Energy Conservation Code

Dear Ms. Keating,

NEMA is the leading voice of the electroindustry. Our nearly 300 members manufacture an array of products that contribute to a safe, efficient, sustainable, and resilient built environment. NEMA member products range from lighting solutions, power center equipment, fire and life safety systems, wire and cabling, electrical safety equipment and much more.

Our combined industries account for 1.84 million American jobs in more than 6,100 facilities across all 50 states. Nationally, these industries contribute nearly \$258 billion in U.S. GDP and \$156 billion in labor income. NEMA members employ 4,300 Delawareans and contribute nearly \$342 million in labor income to the state.

NEMA commends the State of Delaware for its continued leadership on building safety through its consistent review and adoption of the most up-to-date building codes. As a nearly 100-year-old Standards Development Organization, NEMA recognizes the critical role modern codes and standards play in helping to advance the safety and performance of the building stock.

At a time of increasing energy costs and unprecedented demands being placed on the electricity grid, Delaware's adoption of the 2024 International Energy Conservation Code (IECC) and ASHRAE 90.1-2022 will make a tremendous difference to Delaware home and business owners while contributing to a resilient and flexible grid for years ahead. The U.S. Department of Energy (DOE) estimated that moving from the 2018 IECC to the 2024 IECC in Climate Zone 4 will save homeowners over \$200 a year; that is over \$2,243 over the life of a 30-year mortgage<sup>1</sup>.

Additionally, NEMA further applauds the state's inclusion of the electric vehicle space, electric vehicle supply equipment, and electric vehicle equipment installed space provisions. The inclusion of these provisions will greatly assist the state in achieving its laudable electric vehicle goals in a manner that is minimally intrusive and cost-effective to homeowners.

<sup>1</sup> U.S. Dep't of Energy, National Cost Effectiveness of the Residential Provisions of the 2021 IECC at iii, 21 (June 2021), available at [https://energycodes.gov/sites/default/files/2021-07/2021IECC\\_CostEffectiveness\\_Final\\_Residential.pdf](https://energycodes.gov/sites/default/files/2021-07/2021IECC_CostEffectiveness_Final_Residential.pdf).

Finally, NEMA commends the state for including provisions related to solar, energy storage, and electrification readiness. By installing the critical infrastructure now, home and business owners will be able to add these important technologies cost-effectively and with limited disruption.

NEMA applauds Delaware for being a leader in adopting updated building codes on a consistent and timely basis and for doing so through a transparent and inclusive process. The adoption of the 2024 IECC and ASHRAE 90.1-2022 represent a significant step forward towards improving safety, efficiency, affordability, and resiliency for all Delawareans and the inclusion of forward-looking EV, solar, storage, and electrification provisions will help future-proof the state for many years to come.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Sims". The signature is fluid and cursive, with a large initial "T" and a stylized "S".

Todd Sims  
Senior Director, Regulatory & Industry Affairs  
NEMA