

Zi-Xiang Shen
Assistant General Counsel

U.S. mail:
92DC42
PO Box 6066
Newark, DE 19714-6066

667.313.2775 - Telephone
302.429.3801 - Facsimile
Zi-Xiang.Shen@exeloncorp.com



All other deliveries:
92DC42
500 N. Wakefield Drive
Newark, DE 19702

August 6, 2025

Via Email

Theresa Smith
Hearing Officer
DNREC – Office of the Secretary
89 Kings Highway
Dover, DE 19901
DNRECHearingComments@delaware.gov

**RE: Delmarva Power & Light Company's Written Comments on Proposed
Amendments to 7 Del. Admin. C. § 2101 (Docket No. 2025-R-CCE-0008)**

Dear Hearing Officer Smith:

Delmarva Power & Light Company writes to submit comments on DNREC's proposed amendments to the Regulations for State Energy Conservation Code, 7 Del. Admin. C. § 2101.

Delmarva Power is a public utility regulated by the Delaware Public Service Commission. Delmarva Power delivers natural gas safely and reliably to more than 141,000 customers in northern Delaware, including 131,300 residential customers. The Company's gas service territory spans 275 square miles in northern New Castle County and includes approximately 2,183 gas main miles and approximately 1,502 service miles. Delmarva Power is also a member of the Energy Stakeholders Group led by Senator Hansen.

As drafted, DNREC's proposed amendments to Section 2101 mandate that all county and municipal building and plumbing codes comply with the 2024 International Energy Conservation Code (IECC), as well as amendments and appendices to the IECC. The Company supports DNREC's goal of improving the energy efficiency of buildings throughout the State. However, Delmarva Power has concerns about the negative impacts the proposals may have on customer choice and affordability. As currently drafted, the proposed amendments rely primarily on further electrification and do not factor in the ability of natural gas systems to utilize renewable energy sources, including renewable gas.

Additionally, Delmarva Power's gas customer base includes some of the most vulnerable and underserved communities in the State and Delmarva Power serves a significant number of renters. As a result, the Company urges DNREC to consider the impact implementation of the proposals will have on residents' energy costs.

Customer choice and affordability are at the forefront of the Company's operations and are important policy goals in Delaware. Delmarva Power respectfully recommends that DNREC revisit its proposal to avoid unintended obstacles to those priorities.

Delmarva Power greatly appreciates the opportunity to provide comments and looks forward to working with DNREC to meet the energy needs of the communities we serve.

Respectfully submitted,

/s/ Zi-Xiang Shen

Zi-Xiang Shen (DE Bar ID #6072)