

1 Department of Natural Resources  
2 and Environmental Control  
3 Division of Climate, Coastal and Energy  
4 Public Hearing: 7 DE Admin. Code 2101 Regulations  
5 for State Energy Conservation Code  
6

7 Docket No. 2025-R-CCE-0008  
8  
9

10 Moderated by Theresa Smith

11 Tuesday, July 22, 2025

12 6:00 p.m.  
13  
14

15 Remote Proceeding

16 89 Kings Highway

17 Dover, DE 19901  
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22 Reported by: Carlo Florio

23 JOB NO: 7419967  
24

A P P E A R A N C E S

List of Attendees:

Theresa Smith, DNREC, Regulatory Specialist

Anna Keating, DNREC, Division of Climate, Coastal, and  
Energy

Elizabeth Burnette, DNREC, Office of the Secretary

Charlotte Weigel, Manager of Codes and Standards,  
Northeast Energy Efficiency Partnerships

Michael Oleck, New Castle County Division of Ryan

Homes; Vice President, Home Builders Association of  
Delaware

Emily Pugliese, Policy and Program Director, Green  
Building United

Todd Titus, Director of State and Public Affairs,  
Heating, Air-conditioning & Refrigeration Distributors  
International

Kevin Brozyna, K. Hovnanian Homes

Thomas H. Marston, Public Speaker

Lisa Rice, Public Speaker

Reid Rowlands, Public Speaker

Kevin Smith, CEO, Habitat for Humanity of New Castle  
County

Mike O'Halloran, Mid-Atlantic Petroleum Distributors  
Association, Mid-Atlantic Propane Gas Association

1                   A P P E A R A N C E S (Cont'd)

2       Norm Horn, Public Speaker

3       Simon Cho, ACC Exterior

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1 P R O C E E D I N G S

2 MS. SMITH: Good evening. The time is  
3 now 6 p.m. on Tuesday, July 22, 2025. My name is  
4 Theresa Smith, and Secretary Patterson has appointed  
5 me to serve as the hearing officer for tonight's  
6 formal proceeding.

7 For ADA compliance, tonight's formal  
8 proceeding offers closed captioning in a variation of  
9 languages. For those that would like to utilize this  
10 feature, please be advised of the following steps:

11 If you are using a computer, there is a  
12 "Show Captions" button located at the bottom of your  
13 screen. You will need to click that option. If you  
14 don't see the "Show Captions" button, you may have to  
15 select the three dots that say "More."

16 Once you find the "Show Captions"  
17 button, click the caret pointing up, which will bring  
18 up the translation options. You can select your  
19 preferred language from there. If your preferred  
20 language is not listed, you can select "More," and all  
21 the languages will be listed for you.

22 If joining in on a smartphone, please  
23 select the "Captions" button at the bottom of the  
24 screen indicated by "CC." If your preferred language

1 is not listed at the bottom, you may have to select  
2 the three dots that say "More." You will then select  
3 "Meeting Settings" with the gear icon next to it.

4 Once the setting page comes up, located  
5 at the very bottom, select "Translation Languages."  
6 From there you'll be able to select your preferred  
7 language, and then select "Done" at the top right  
8 corner, and then "Done" again.

9 We ask that those joining in please  
10 turn your cameras off and keep them off for the  
11 remainder of the hearing.

12 To go on, if the captions are not  
13 automatically popping up yet, you may need to select  
14 "Captions" again and then "Show Captions". So  
15 hopefully by now everybody is connected properly.

16 And we will now move forward to begin  
17 the hearing tonight. First and foremost, I want to  
18 thank everyone for taking time out of your busy  
19 schedules to connect with us tonight.

20 We are here this evening to provide a  
21 virtual platform for the State of Delaware's  
22 Department of Natural Resources Environmental Control  
23 to conduct a virtual public hearing on Docket Number  
24 2025-R-CC-008, the proposed revisions to 7 DE Admin.

1 Code 2101 Regulations for State Energy Conservation  
2 Code.

3 The purpose of tonight's hearing is to  
4 build a record in regard to the hearing matter by  
5 providing a formal legal platform for the public to  
6 learn about the proposed revisions and to enable the  
7 public a platform to offer their verbal comment.

8 This hearing is being conducted  
9 virtually. No one is together in the same room.  
10 Everyone is participating independently at their own  
11 respective locations. While we are not physically  
12 gathered tonight, Zoom does generate a list of those  
13 who are virtually present for this proceeding so the  
14 department will have a record of those who have  
15 electronically joined this event.

16 There is a court reporter virtually  
17 present who will prepare a verbatim transcript of this  
18 hearing pursuant to the statutory requirement for  
19 DNREC to have the same prepared. And as always, that  
20 transcript will be posted on the hearing webpage  
21 dedicated to this matter as soon as it is received.

22 In addition, I would encourage those  
23 who are attending the hearing to also visit the  
24 hearing webpage dedicated to this matter for

1 additional details concerning the proposed revisions  
2 to 7 DE Admin. Code 2101 Regulations for State Energy  
3 Conservation Code.

4 The hearing record presented tonight,  
5 along with other related documents, are posted on the  
6 hearing -- DNREC's hearing webpage dedicated to this  
7 matter. The hearing webpage, again, can be found  
8 online under the administrative law section of DNREC's  
9 website. That will be listed towards the end of  
10 tonight's hearing.

11 At the conclusion of my introductory  
12 remarks, I will be turning the hearing over to the  
13 department staff to provide the presentation for the  
14 record being generated in this matter.

15 Once the presentation concludes, those  
16 persons who have pre-registered in advance of the  
17 hearing will be acknowledged and provided an  
18 opportunity to offer their verbal comment on the  
19 proposed regulatory matter in alignment with DNREC's  
20 standard comment protocols that will be discussed  
21 greater -- in greater detail at that time.

22 Before we begin the presentation,  
23 please be advised of the following protocols that  
24 remain in place for all DNREC public hearings:

1 All comment received must be limited  
2 solely to the subject matter of tonight's hearing.  
3 All comments pertinent to the subject matter of the  
4 virtual hearing will be incorporated into the record  
5 being generated in this matter.

6 In light of the Administrative Act  
7 Procedure and to ensure that everyone who wishes to  
8 offer comment for the secretary's consideration is  
9 accommodated, the department is required to, at a  
10 minimum, provide a comment period of 15 days after the  
11 hearing.

12 There is only one authentic record of  
13 the formal proceeding tonight, and it is the official  
14 court report's verbatim transcript.

15 The statutory purpose of tonight's  
16 hearing is to build a record with regard to the  
17 department's proposed actions. A record consisting of  
18 the transcript of this hearing tonight, all written  
19 comment, all exhibits, and eventually the hearing  
20 officer report will be reviewed by Secretary  
21 Patterson.

22 The secretary will ultimately issue an  
23 order following that review process, containing his  
24 decision on this matter and the reasons therefore.

1 Per DNREC's standard hearing protocols, there will be  
2 no Q-and-A or chat session available and permitted  
3 during the hearing.

4 It is important to note no decision has  
5 already been made by the department, nor will a  
6 decision be made tonight with regard to the proposed  
7 regulatory matter.

8 As previously stated, DNREC wishes to  
9 ensure that everyone is enabled to offer their  
10 comments for inclusion into the record being generated  
11 in this matter. As noticed in the legal ads and  
12 online, the public comment period will be made open  
13 through August 6, 2025.

14 Comments may be submitted directly to  
15 DNREC through a comment form link on the hearing  
16 webpage, via email to  
17 dnrechearingcomments@delaware.gov, or via the U.S.  
18 Postal Service at the physical address for DNREC  
19 indicated on the hearing webpage and the public  
20 notices previously issued in this matter.

21 Written comments to DNREC may not be  
22 submitted using social media platforms such as  
23 Twitter, Facebook, YouTube; links to videos; or text  
24 messaging.

1                   Please remember that all comment  
2     received, either through USPS or via the electronic  
3     mechanisms noted just now, as long as received by the  
4     department on or before August 6th, will bear the  
5     exact same weight and will be considered equally by  
6     the secretary prior to making his final decision in  
7     this matter.

8                   While all comments are appreciated,  
9     each commenter must be limited solely to the subject  
10    matter of tonight's hearing. Multiple comments saying  
11    the same thing do not outweigh one singular comment.  
12    Simply put, comments are not votes. A single  
13    well-supported comment may carry more weight than a  
14    thousand form letters.

15                  I also want to note that only comments  
16    submitted directly to DNREC and entered by myself into  
17    the formal hearing record in this matter will be  
18    posted on the hearing webpage and be considered by the  
19    department as a part of the decision process.

20                  The department has not partnered with  
21    any outside organizations or websites to assist the  
22    public submission of comments in this matter. So  
23    again, only submit comments to DNREC directly.

24                  Lastly, the ultimate decision regarding



1     this matter is made by DNREC Secretary Patterson. The  
2     formal -- this formal proceeding tonight acts as a  
3     mechanism to enable the department to thoroughly vet  
4     the hearing matter to the public and to let the public  
5     know various ways to which comment may be submitted  
6     for Secretary Patterson's consideration if so desired.

7             I will now hand it over to Anna Keating  
8     with the Division of Climate Coastal and Energy to  
9     provide the department's presentation.

10            Anna?

11            MS. KEATING: Thank you, Theresa.

12            So the proposed regulatory action is to  
13     adopt the 2024 International Energy Conservation Code  
14     with zero-net-energy-capable amendments for  
15     residential buildings, the 2024 IECC and ASHRAE  
16     90.1-2022 for commercial and high-rise residential  
17     buildings, and also to adopt Appendix RE for EV  
18     charging infrastructure and Appendix CB for solar  
19     ready zones, both amended to align with corresponding  
20     statutory requirements.

21            The statutory requirements that guided  
22     the development of this regulation are Title 16 of  
23     Delaware Code, Section 7602, which requires the State  
24     Energy Office to conduct a triannual review of the

1 State Energy Code and also requires all new  
2 residential building construction to be  
3 zero-net-energy-capable as of December 31, 2025.

4 Section 7605 establishes solar-ready  
5 zone requirements for new commercial buildings, and  
6 Chapter 80 establishes EV charging infrastructure  
7 requirements for new residential buildings.

8 Stakeholder engagement is a critical  
9 aspect of both the informal and formal regulatory  
10 development process. Engagement with the interested  
11 persons list has been continuously maintained through  
12 frequent updates and active dialogue.

13 Preliminary stakeholder engagement with  
14 builders, nonprofits, and municipalities indicated  
15 support for adopting the 2024 IECC, opposed to the  
16 2021 version.

17 We met with the Home Builders  
18 Association of Delaware in November; Green Building  
19 United, New Castle County, the City of Lewes, and the  
20 City of Newark in December; the Sierra Club in  
21 February; and K. Hovnanian Homes in March.

22 The State Energy Office also held a  
23 Code collaborative meeting in February that reaffirmed  
24 stakeholder engagement for adopting the 2024 IECC.

1 The State Energy Office held another Code  
2 collaborative meeting in May that reviewed the  
3 proposed energy code in the draft regulation and  
4 offered stakeholders an opportunity to provide  
5 feedback.

6 Feedback from this meeting informed  
7 revisions to the draft regulation, including the  
8 formal -- the removal of the requirement for an ERI  
9 value of zero after factoring in on-site power  
10 production, the removal of the amendment that required  
11 two additional measures to achieve credits in the 2024  
12 IECC table R408.2, and the removal of appendices that  
13 are not supported by statutory requirements.

14 The formal regulatory development  
15 process was initiated by the start action notice  
16 undergoing division director's review, receiving the  
17 secretary signature and being distributed to the  
18 interested persons list.

19 A deputy attorney General from the  
20 Environmental Unit of the Department of Justice  
21 conducted a legal review of the draft regulation, and  
22 the deputy secretary then reviewed and approved the  
23 draft regulation.

24 Legal notice advertising the public

1 hearing was made available on the DNREC website, the  
2 public meeting calendar, and published in both The  
3 News Journal and the Delaware State News. Spanish and  
4 Haitian Creole translations of the legal notice were  
5 also posted on the DNREC website.

6 The proposed regulation, register  
7 notice, and Regulatory Flexibility Analysis and Impact  
8 Statement were published in the Register of  
9 Regulations.

10 There are two corrections to the  
11 Register of Regulations publication from July 1st.  
12 The register notice incorrectly states that the  
13 proposed regulation includes the adoption of the  
14 appendices listed here.

15 This error was noticed while conducting  
16 a review of the publication, and the regulation  
17 proposes the adoption of only Appendix RE and Appendix  
18 CB. Also, the proposed regulation inadvertently omits  
19 measure number R408.2.1.4 for reduced air leakage from  
20 table R408.2.

21 This error was brought to our attention  
22 through public comment, and the final proposed  
23 regulation will include R408.2.1.4 in table R408.2 as  
24 written for climate zone four in the 2024 IECC.

1 I would now like to enter the following  
2 proposed exhibits into the record: the February  
3 Delaware Code Collaborative PowerPoint, the approved  
4 start action notice, the May Delaware Code  
5 Collaborative PowerPoint, two PNNL reports on the  
6 national cost effectiveness of the residential  
7 provisions of the 2021 and the 2024 IECC, the State  
8 public meeting calendar legal notice, the public  
9 hearing event page, the English public notice that was  
10 posted on the DNREC website, the Spanish and Haitian  
11 Creole public notices that were posted on the DNREC  
12 website, the affidavits and legal notices published in  
13 the News Journal and the Delaware State News, the  
14 register notice, the Regulatory Flexibility Analysis  
15 And Impact Statement, and the proposed regulation that  
16 was published in the register, and the public hearing  
17 presentation. And that concludes my presentation.

18 MS. SMITH: Thank you, Ms. Keating.  
19 Have there been any changes to the initial proposed  
20 exhibits that were available on the hearing webpage?

21 MS. KEATING: Yes. The proposed public  
22 hearing presentation was revised on July 18th to note  
23 corrections to the register publication.

24 MS. SMITH: Got it.

1           As currently posted on the hearing  
2 webpage and introduced into the hearing record, I  
3 hereby mark these proposed exhibits as Department's  
4 Exhibits 1 through 14.

5                   (Department Exhibit 1 through  
6 Exhibit 14 were marked for  
7 identification.)

8           And as you stated, that now concludes  
9 the department's presentation, and we will turn our  
10 attention to those who pre-registered for their  
11 opportunity to offer verbal comment for tonight's  
12 hearing.

13           Per the protocol set forth on DNREC's  
14 public hearing webpage and in the legal notices issued  
15 in this matter, those wishing to offer verbal comment  
16 during the virtual hearing must have pre-registered  
17 with DNREC no later than noon the day of the hearing.  
18 The order of these commenting tonight was established  
19 as a result of the department's preregistration  
20 process.

21           All comments -- all commenters must  
22 adhere to the department's protocols with regard to  
23 offering verbal comment, including making their  
24 comments as concise as possible, respecting the

1 three-minute time limit, and limiting their comments  
2 to the subject matter of tonight's hearing.

3 There are 12 commenters that have  
4 pre-registered to provide a verbal comment tonight.  
5 To prepare you for the order in which you'll be called  
6 upon, I'm going to read off a list of those who have  
7 pre-registered.

8 First to be called upon will be  
9 Charlotte Weigel. Second, Michael Oleck. Three --  
10 third, Emily Pugliese -- and I apologize if I  
11 mispronounce your name. Fourth is Todd Titus. Five,  
12 Kevin Brozyna. Six is Thomas Marston. Seven, Lisa  
13 Rice. Eight, Reid Rowlands. Nine, Kevin Smith. Ten,  
14 Mike O'Halloran. Eleven, Norm Horn. And twelfth will  
15 be Simon Cho.

16 To assist the commenters with regard to  
17 the amount of time they have, there will be a visual  
18 timer that will appear on the screen that will count  
19 down a three-minute timer.

20 When a speaker is called upon, the  
21 system will ask you to unmute yourself if you have  
22 joined electronically, or if you have called in, you  
23 will need to press, I believe, star six or star nine.  
24 It should prompt you and let you know how to unmute

1     yourself as your name is called.

2                 Once you have unmuted yourself, I ask  
3     that you please state your name, first and last name,  
4     for the record, and the company you are representing  
5     if there is one, and then the timer will begin.

6                 At the end of three minutes, the  
7     speaker's audio will be automatically placed back on  
8     mute, and for no reason will the commenter be granted  
9     more than three minutes of time to speak.

10                If the speaker is not able to finish  
11     their comment within that time period, the department  
12     encourages them to submit their completed comment in  
13     writing no later than August 6th. The comment will be  
14     transcribed by the court reporter and thereby  
15     incorporated into the hearing record.

16                Please note there will be no video feed  
17     of the commenter, and it is only going to be audio.  
18     We ask that you do keep your cameras off.

19                Before we get started, I'd ask that we  
20     get the three-minute timer up on the screen. Great.  
21     Okay. We'll go ahead and get started. The first,  
22     again, that will be called upon is Charlotte Weigel.  
23     May I have Charlotte Weigel, please, unmuted?

24                And then you may please provide your



1 first and last name and who you represent for the  
2 record, and then you may begin your comment.

3 MS. WEIGEL: Good evening. My name is  
4 Charlotte Weigel, and I'm a manager of codes and  
5 standards at Northeast Energy Efficiency Partnerships  
6 or NEEP.

7 MS. SMITH: Okay. You may begin.

8 MS. WEIGEL: Okay. NEEP is an  
9 independent nonprofit, nonpartisan organization that  
10 advances energy efficiency in homes and businesses in  
11 the Northeast and Mid-Atlantic region.

12 We commend the Delaware Department of  
13 Natural Resources and Environmental Control for its  
14 leadership in advancing the State Energy Conservation  
15 Construction Code to comply with Title 16,  
16 Chapter 7602, requiring all new residential building  
17 construction in the state to be  
18 zero-net-energy-capable as of December 31, 2025.

19 The draft building code as published in  
20 July 2025 with strengthening provisions is an  
21 important step in improving building performance,  
22 lowering energy costs, and supporting long-term  
23 resilience.

24 Moreover, incorporating strengthening

1 amendments across all model code compliance paths and  
2 the introduction of passive house and zero-net-energy  
3 homes compliance paths offers needed flexibility to  
4 builders while encouraging innovation to deliver the  
5 maximum benefit of energy efficiency to homeowners.

6 In the interest of protecting Delaware  
7 consumers from unnecessary retrofit costs and further  
8 reducing household energy burdens, we propose adoption  
9 of the following code appendices: Appendix RB,  
10 solar-ready provisions; Appendix RD, electric energy  
11 storage provisions; Appendix RJ, demand-responsive  
12 controls; and Appendix RK, electric-ready residential  
13 building provisions.

14 Inclusion of these appendices prepares  
15 Delaware homes for adoption of technologies that are  
16 necessary to mitigate growing electrical grid strain  
17 at a minimal cost to consumers and empowers them to  
18 save on energy bills.

19 On June 23, 2025, PJM reported the  
20 highest peak demand in over a decade, 6,000 megawatts  
21 higher than the forecasted 2025 summer peak.  
22 Furthermore, PJM's long-term forecast for peak demand  
23 in 2035 have increased from the 2024 forecast by 17  
24 percent within this past year alone.

1                   Requiring new residential construction  
2     to include minimal infrastructure to support on-site  
3     renewable energy production, energy storage,  
4     demand-responsive electric water heaters, and other  
5     efficient electric appliances will allow residents to  
6     more affordably integrate these technologies, provide  
7     resilience to homes and relief to the grid, and  
8     empower residents with better control over household  
9     energy costs.

10                  A study commissioned by the National  
11     Association of Home Builders showed the impact of  
12     these appendices on cost of construction to be  
13     minimal. The study concluded that for a 2,400 square  
14     foot two-story single-family home in Delaware,  
15     inclusion of Appendix RB, RJ, and RK would add \$975,  
16     or just 0.25 percent, to the total construction cost,  
17     based on the national average of \$162 per square foot.

18                  Considering the minimal impacts on cost  
19     of construction from available data from home  
20     builders, adoption of these appendices in combination  
21     with the proposed amendments to enhance energy  
22     efficiency will deliver the best results for Delaware  
23     residents by providing resiliency in residential new  
24     construction, control over energy bills, and stability

1 to the regional grid.

2 Thank you, and I appreciate the  
3 opportunity to provide this technical expertise.

4 MS. SMITH: Thank you, Ms. Weigel.

5 Next, may I have Mr. Michael Oleck  
6 unmuted?

7 MR. OLECK: Hi. Michael Oleck here  
8 from the New Castle County division of Ryan Homes, and  
9 vice president for the Home Builders Association of  
10 Delaware.

11 MS. WEIGEL: Thank you. You may begin.

12 MR. OLECK: Thank you.

13 My full-time job is a production  
14 manager for NVR, working under the Ryan Homes brand,  
15 and I'm currently dedicated to building communities in  
16 New Castle County. I'm a lifelong Delawarean, born  
17 and raised. I started my home-building career as an  
18 intern with NVR in 2004. For 21 years now, I've  
19 dedicated myself to building homes and communities for  
20 families right here in Delaware.

21 I understand the need to adopt new  
22 energy codes, and I support adopting the 2024 IECC,  
23 but I have concerns with the amendments being  
24 proposed.

1                   Recently, The News Journal ran an  
2     article citing that most families earning under 120  
3     percent of the state's median income of \$80,000 cannot  
4     afford to buy a home. I'm sure we can all remember at  
5     a time when that was not the case. In fact, prior to  
6     the global pandemic of 2020, I always felt that it was  
7     affordable to buy a home and raise a family in the  
8     state of Delaware.

9                   As a construction professional, a  
10    husband of a registered nurse here in Delaware, and a  
11    father of four who has deep roots here, I worry about  
12    the direction of home affordability here in our state.

13                  When my kids start their careers, and  
14    if they choose to stay here, pursue nursing or  
15    construction as their occupations, will they be able  
16    to afford a home here in their home state?

17                  According to the NAHB, one-third of the  
18    cost of a new home goes into the cost of compliance  
19    with regulation. So we need to be balanced and fair  
20    when adopting new codes and regulations.

21                  This month, my company did a study that  
22    revealed that 10 percent of homebuyers who mortgaged  
23    their homes with NVR last year would be priced out of  
24    qualification of their new home if this energy code

1 proposal was adopted as written. Statewide, that  
2 would be 550 new homes that would not be built or  
3 sold.

4 Studies differ but show that each  
5 residential building permit creates between 2.9 and  
6 4.1 direct jobs in the local economy. This implies  
7 that Delaware stands to lose between 1,600 to 2,255  
8 jobs from reduced permit activity with the adoption of  
9 this proposal.

10 The NAHB estimates that the local  
11 impact of each permit is \$111,000 in taxes, fees, and  
12 local revenue. With 550 fewer permits, local Delaware  
13 economies would stand to lose just over \$61 million in  
14 spending. The housing affordability issue is, at its  
15 core, a supply and demand issue. We have a national  
16 and statewide shortage of housing. Until we solve  
17 that problem, prices will remain high.

18 I urge DNREC to continue working with  
19 stakeholders to improve its energy code and adopt the  
20 2024 IECC unamended. It is important we balance good  
21 energy policy with economic growth and affordability.

22 Energy savings is great, but we can't  
23 make housing a luxury good in the process, and it is  
24 important to remember that before a family can take

1 advantage of energy savings, they have to be able to  
2 afford the home. Thank you.

3 MS. SMITH: Thank you, Mr. Oleck.

4 May I have Emily unmuted?

5 MS. PUGLIESE: Hi. My name is Emily  
6 Pugliese. I am the policy and program director at  
7 Green Building United.

8 MS. SMITH: Thank you. You may begin.

9 MS. PUGLIESE: Good evening, everyone.  
10 Just to give you a little background, Green Building  
11 United is an independent 501(c)(3) nonprofit  
12 organization whose mission is to advance an equitable  
13 transition to a climate-friendly and healthy built  
14 environment through education, advocacy, and strategic  
15 initiatives.

16 Our region includes the Greater  
17 Philadelphia area, Lehigh Valley, and the state of  
18 Delaware. Our members include architects, engineers,  
19 policy makers and advocates, landscape architects,  
20 marketing and communications professionals,  
21 developers, contractors, building managers, building  
22 operators, government workers, and more.

23 I am coming -- commenting today on  
24 behalf of our diverse membership. Green Building

1 United appreciates the opportunity to express our  
2 strong support for Delaware's adoption of the 2024  
3 international codes as amended by the Delaware  
4 Department of Natural Resources and Environmental  
5 Control.

6 The international codes are developed  
7 and voted on by a diverse group of professionals that  
8 include experts from government and industry  
9 professionals. The open and transparent consensus  
10 process ensures that the outcome reflect the best  
11 technology, materials, and practices that the market  
12 can bear.

13 They are widely used throughout the  
14 United States, helping provide consistency for the  
15 architects, engineers, and contractors that work  
16 across jurisdictions. Delaware has an opportunity to  
17 be a leader in the region, paving the way for the  
18 surrounding states to implement energy- and  
19 cost-saving code updates.

20 To capitalize on the opportunity for  
21 success, we encourage the State to provide robust  
22 education and training, specifically to small to  
23 medium home builders and local code enforcement  
24 officials.



1                   While large and high-end builders and  
2                   contractors often have internal resources to learn new  
3                   code requirements and adjust plans, documentation, and  
4                   practices, Delaware needs to prioritize providing  
5                   training so that all builders and contractors in the  
6                   state understand the code changes and compliance  
7                   requirements.

8                   Code enforcement in Delaware occurs at  
9                   the local jurisdiction level. Local building  
10                  officials need robust education and training to  
11                  understand the new requirements and learn proper  
12                  enforcement and compliance checking procedures.  
13                  Successful implementation will require time and  
14                  resources, including comprehensive education and  
15                  training to support code enforcement.

16                  In conclusion, Delaware has an exciting  
17                  opportunity to lead the region in modern energy code  
18                  adoption with the adoption of the 2024 IECC, reducing  
19                  the long-term energy burden for Delaware residents and  
20                  improving the quality, asset value, and performance of  
21                  the -- of buildings for prospective buyers.

22                  We appreciate your consideration of our  
23                  comments and welcome any additional questions. Thank  
24                  you.

1 MS. SMITH: Thank you.

2 Next we have Mr. Todd Titus.

3 MR. TITUS: Hi. I'm Todd Titus. I'm  
4 the director of state and public affairs for the  
5 Heating, Air-conditioning & Refrigeration Distributors  
6 International, also known as HARDI. I'd like to thank  
7 you for the opportunity to provide feedback and offer  
8 comments on the proposed regulations for State Energy  
9 Conservation Code.

10 HARDI is a trade association comprising  
11 of more than 1,150 member companies, with over 490  
12 U.S.-based wholesale distribution companies that  
13 include 11 wholesale distributor members in Delaware  
14 and 21 locations throughout the state, serving  
15 heating, ventilation, and air-conditioning  
16 contractors, technicians in the state.

17 HARDI respectfully asks that the  
18 DNREC's proposed updates for the code be revised to  
19 not prescriptively ban the installation of natural gas  
20 systems by increasing the cost of natural gas systems  
21 with needless requirements. The proposed requirements  
22 for new residential building construction limit  
23 consumer's choice for HVAC systems.

24 HARDI believes in protecting consumers'

1 right to purchase and install whichever style of HVAC  
2 products they prefer.

3           However, as currently written, Section  
4 R409 of the proposed State Energy Conservation Code  
5 imposes a heat-pump-ready requirement for HVAC systems  
6 that would remove consumer choice by pricing out  
7 natural gas installations with unreasonable standards  
8 that the consumers could not afford to comply with,  
9 forcing the consumers to purchase heat pumps even if  
10 they prefer to install natural gas.

11           The proposed updates would have a  
12 significant adverse economic impact on businesses and  
13 residents statewide. The DNREC-provided exhibits do  
14 not consider Section R409 requirements for  
15 participation in the DOE'S ZEHR program. The DOE  
16 itself describes the program as being rigorous  
17 requirements.

18           As such, HARDI disagrees with any  
19 determinations that the proposed changes would not  
20 result in increased expenses. In Section R47 -- 4079,  
21 the DNREC is -- effectively prohibits the use of  
22 natural gas furnaces to increase the cost of natural  
23 gas HVAC systems without any actual benefits to the  
24 consumer.

1           The requirements to implement a  
2   heat-pump-ready home will undoubtedly have a dramatic  
3   economic impact in Delaware, based on the installation  
4   cost and energy prices between gas and electricity.

5           For instance, if electric heat pump  
6   installations are mandated for Delaware residents, the  
7   cost of living will rise. Specifically, the average  
8   annual cost for electric ducted heat pump in Delaware  
9   would be around \$2,062, compared to around 1,632 for a  
10   natural gas furnace.

11           The proposed updates also preempt the  
12   Environmental Policy Conservation Act, known as EPCA,  
13   by forcing the electrification of all new residential  
14   construction and indirectly banning natural gas  
15   systems.

16           The U.S. Court of Appeals for the Ninth  
17   Circuit recently invalidated Berkeley California's ban  
18   on natural gas infrastructure in new buildings, citing  
19   EPCA's preemption clause. This clause states that  
20   once a federal energy conservation standard is  
21   effective, no state regulations concerning energy use  
22   can apply.

23           Since EPCA defines energy use as energy  
24   consumed by a product at point of use, any regulation

1 restricting the appliance use impacts energy -- excuse  
2 me -- use impacts energy consumption. The -- the  
3 proposal would impose unnecessary electrification  
4 requirements on new residential buildings using  
5 natural gas HVAC systems, creating costs that average  
6 citizens cannot afford.

7           Though natural gas systems are  
8 technically allowed, the mandated requirements  
9 effectively act as a ban due to these costs that  
10 violate EPCA's preemption prohibition as the proposal  
11 is presented. HARDI and Delaware share the goal of  
12 moving consumers --

13           MS. SMITH: I apologize, Mr. Titus. We  
14 do encourage you to please submit your full comment in  
15 writing. Thank you for your comment.

16           Next we have Kevin Brozyna. May I have  
17 Kevin Brozyna unmuted?

18           MR. BROZYNA: Hey.

19           MS. SMITH: You have -- I -- if you're  
20 listening on two different devices, you may have to  
21 turn off one of them.

22           MR. BROZYNA: Only on one device. Can  
23 you hear me all right?

24           MS. SMITH: No. The echo -- terribly

1 bad.

2 THE REPORTER: You'll need to mute one  
3 device.

4 MR. BROZYNA: Let me ask if you can  
5 circle back.

6 MS. SMITH: We'll do that. If you want  
7 to log out and then re-log back in, I'll put you at  
8 the end of the list.

9 MR. BROZYNA: Thank you.

10 MS. SMITH: Okay. Next to speak is  
11 Thomas Marston.

12 MR. MARSTON: Good evening. I am  
13 Thomas Marston. I'm a retired energy rater from  
14 Delaware and Maryland. I am pleased to speak tonight  
15 to Delaware. I am in strong support of adopting the  
16 '24 IECC. I do not support the mandates to move to  
17 Net Zero Energy Ready.

18 This is odd because I have 40 years of  
19 history working in energy efficiency with my partner  
20 Ed Mitch. We were the first rater in Delaware. We  
21 were the first advocates to the Energy Star program.  
22 So why would I support this?

23 I'm afraid that this mandate, given  
24 that we have a HERS industry that's supporting 44

1 percent of the homes in Delaware as of '24 -- probably  
2 higher over this year -- and in 2007 when I left  
3 Delaware to move to Maryland, we were at 20 percent.

4 Delaware, you're doing an excellent job  
5 of moving forward because you've embraced the support  
6 of raters and moved into the above-code home programs  
7 that are available, Energy Star and DOE Zero Energy  
8 Ready.

9 So why are raters important? Well, Ed  
10 and I introduced innovative solutions for making sure  
11 buildings are more airtight, they have thermal bypass  
12 solutions installed, and ducts perform well. Let's  
13 look at duct work. In the 80s, duct systems in  
14 Delaware were generally returns to every bedroom that  
15 were not -- that were cavity-fed. Duct work was  
16 leaky, wasn't going to be comfortable with heat pumps.

17 We brought innovation to the duct  
18 system by saying, "Let's go to central returns."  
19 Wasn't a code mandate to have a return in every room,  
20 just had to make sure it functioned well. And today,  
21 almost all buildings in Delaware use a centralized  
22 return, well-sealed because code mandates, and keep  
23 the ducts inside the building envelope.

24 But homes that don't have ducts in

1 conditioned space, such as vented crawl spaces or  
2 flood zones -- take the -- the beach houses are not  
3 going to reach Zero Energy Ready as prescribed.

4 One of my greatest complements to code  
5 has been helping the development of R408.2 to be  
6 inserted into the '24. This is moving the rater  
7 knowledge of modeling into code solutions for  
8 prescriptive path.

9 Now consider that if you ask for 30  
10 points, when you do this, you will most likely lead  
11 people to install R408.2.7, solar application. That  
12 will probably cut away from 405 and 406 and rater  
13 influence. I would love to add more. I'm being cut  
14 off.

15 MS. SMITH: Thank you, Mr. Marston.  
16 Again, we do encourage you to submit your comments in  
17 writing if you're unable to provide your full comment.

18 Next we have Ms. Lisa Rice. May I have  
19 Ms. Rice unmuted?

20 Ms. Rice, if you are on -- logged in,  
21 please raise your hand so we can identify you. Should  
22 be a feature, if you're logged in online, to do so.

23 Ms. Burnette, do you have Lisa Rice?

24 MS. BURNETTE: I am unable to find this



1 person based on the phone number or name given in the  
2 hearing registration at this time.

3 MS. SMITH: Thank you. We'll move on.  
4 I don't see anyone raising their hand either. We'll  
5 move on to the next speaker, Reid Rowlands. May I  
6 have Mr. Rowlands unmuted?

7 MR. ROWLANDS: Yes. My name is Reid  
8 Rowlands. I'm representing myself. I'm a certified  
9 passive house consultant, having worked on many  
10 zero-energy buildings. And with my background in  
11 passive house, I have a few technical comments and  
12 questions and apologize for speaking quickly 'cause I  
13 need to get it all in.

14 So Section 407.2.1.1(a) requires, to  
15 get a permit, a design certification letter by FIUS.  
16 But then, below that, to get a certificate of  
17 occupancy, it requires a final certification letter  
18 or, again, a design certification letter from FIUS.

19 The final certification letter is fine,  
20 as it certifies as built. The design certification  
21 letter does not show as built, and so I do not believe  
22 it should be the option here.

23 In Section 407.2.1.2(f), it wants a  
24 statement from the FIUS project verifier. I believe

1 this should be -- should say "rater." FIUS-certified  
2 verifiers usually do commercial buildings, whereas a  
3 FIUS-certified rater does residential.

4 Table 408.2, additional energy  
5 efficiency requirements. If I apply for 408.2.1(7),  
6 then by default, can I apply for all the ones above  
7 and earn 25 credits, which I do not believe was the  
8 intent?

9 Table 408.2.1.2. I think it unlikely  
10 that a window exactly hits the 0.25 U-factor and solar  
11 heat gain coefficient of 0.40. So maybe the U-factor  
12 should be 0.25 or less.

13 And the solar heat gain coefficient is  
14 a little more difficult from a passive house  
15 perspective. There are times that we want to see a  
16 higher solar gain coefficient to take advantage of the  
17 heat gain in the winter, but we'll shade it during the  
18 summer.

19 In Section 408.2.3(1), you use "fossil  
20 fuel," but the other sections use "gas fired." Maybe  
21 for continuity, this should be "gas fired," or change  
22 all to "fossil fuel."

23 Section 408.2.5(2), (4), and (5). I  
24 would like you to consider changing to the "per square

1 foot of enclosure" method. At the top of the section,  
2 you penalize buildings over 5,000 square feet by  
3 requiring an additional five points, which I like.

4 But here, you reward larger buildings,  
5 as the larger square footage of a building, the easier  
6 it is to get a better blower door number. It also  
7 penalizes smaller compact buildings. So the "per  
8 square foot of enclosure" method levels the playing  
9 field.

10 And finally, Section 4.0 is confusing  
11 to me. 4.1 reads "Except as otherwise noted in  
12 Title 16," which I take to mean requires the code to  
13 be met by January 1st for residential. I also took  
14 this to mean that it's a commercial building. Then  
15 there is the 12-month date. And then Section 4.2  
16 seems redundant but may be meant to clarify.

17 I made it.

18 MS. SMITH: Perfect. Thank you,  
19 Mr. Rowlands, for your comment.

20 We will now move on to Mr. Kevin Smith.  
21 May I have Mr. Smith unmuted?

22 MR. SMITH: Good evening. Hi. This is  
23 Kevin Smith. I'm the CEO with Habitat for Humanity of  
24 New Castle County. Appreciate the opportunity to

1 speak to DNREC about this proposal. I'm here to tell  
2 you about our mission.

3 We seek to put God's love into action  
4 by building homes, community, and hope. We serve  
5 first-time homebuyers, people who make between 30 and  
6 80 percent of the area median income. These are folks  
7 who cannot get a mortgage through any other means,  
8 other than coming to Habitat.

9 We also work with the Delaware Housing  
10 Coalition and the Housing Alliance of Delaware and  
11 other affordable housing providers.

12 Our experience over the 39 years that  
13 we've been working -- we've helped build or renovate  
14 315 homes for first-time homebuyers. And through  
15 those years, we've been supportive of different ways  
16 that we can innovate and make our homes  
17 energy-efficient.

18 We've worked with Energy Services Group  
19 with Tom Marston over the years to make our homes  
20 comply to Energy Star. And most recently, proud to  
21 say that we are now building Net Zero Ready homes.

22 However, we would not be able to build  
23 those homes to that level without the financial and  
24 consulting support of Energize Delaware and

1 Energize -- and New Ecology. The total extra cost to  
2 us to build to that level is 17,000 per house. So  
3 without those resources, we would not have chosen to  
4 build to that level.

5 In the state of Delaware and across  
6 this country, we have an affordable housing crisis.  
7 According to the National Low Income Housing  
8 Coalition, the state of Delaware is short over 20,000  
9 units of affordable housing. That's right. 20,000  
10 units.

11 We already have a restrictive zoning  
12 code, and adding more restriction in our building code  
13 is only going to make this problem worse, not better.  
14 The impact on this -- on these amendments to the base  
15 2024 IECC will hurt low-to-moderate-income people who  
16 are already getting the short shrift in the  
17 marketplace.

18 It is like we are requiring everybody  
19 to buy Teslas instead of just a hybrid car. So it is  
20 for that reason that we continue to support energy  
21 efficient in the base adoption of the 2024 IECC, but  
22 without these amendments that we believe will cause  
23 further harm to those that we're trying to serve.  
24 Thank you.

1 MS. SMITH: Thank you, Mr. Smith.

2 May I have Mr. Mike O'Halloran unmuted?

3 MR. O'HALLORAN: Hey there. Good  
4 evening. My name is Mike O'Halloran, and I'm offering  
5 comments on behalf of the Mid-Atlantic Petroleum  
6 Distributors Association as well as the Mid-Atlantic  
7 Propane Gas Association.

8 Analyses have shown, as some of the  
9 other commenters have mentioned or alluded to --  
10 analyses have shown that additional cost impacts of  
11 the 2024 IECC with amendments leads to an all-electric  
12 compliance cost of around \$12,000, and \$16,000 for  
13 mixed-fuel homes.

14 These are builder costs. These are --  
15 these are not what the homebuyer pays at the end of  
16 the day, which would more than likely be greater.

17 We also see adoption of these proposed  
18 regulations as an implicit endorsement of a gas ban in  
19 favor of full electrification, something that removes  
20 customer choice. Homeowners, farmers, and businesses  
21 will no longer be able to determine what energy source  
22 makes the most sense for them and their situation when  
23 it comes to heating their homes and offices, cooking  
24 their meals, and taking a hot shower.

1                   There's also serious concern over what  
2                   full electrification will do to Delaware's grid.  
3                   There's a dearth of power generation in the state, and  
4                   electricity bills are increasing dramatically already.  
5                   Taking this and adding these regulations is a formula  
6                   for even higher utility bills and an overburdened  
7                   power grid.

8                   We'd respectfully request the  
9                   department to forego adoption of these regulations as  
10                  currently proposed. Thank you.

11                  MS. SMITH: Thank you for your comment.

12                  Next we have Mr. Norm Horn.

13                  MR. HORN: Thank you. Norm Horn,  
14                  representing myself this evening. I'd actually like  
15                  to decline to comment at this point. I'll submit some  
16                  written comments to the record later. Thank you.

17                  MS. SMITH: Thank you, Mr. Horn.

18                  Simon Cho. Mr. Cho, you may begin.

19                  MR. CHO: Hi. Yes. Hello and thank  
20                  you for opportunity to speak today. My name is Simon  
21                  Cho. I am the president of ACC Exterior, a siding and  
22                  exterior construction company based in Gaithersburg  
23                  but proudly working with builders and homeowners  
24                  throughout the -- Delaware.

1           Like many other speakers before me, I  
2     want to echo the concern they already raised about the  
3     proposed change to the energy code. I stand in full  
4     support -- energy-efficient buildings, but I also  
5     believe this is -- particular proposal goes too far  
6     and too quickly, especially at this, like, critical  
7     time when approval is record low.

8           As others have pointed out, the  
9     estimated 50,000 to 30 -- 30,000 dollars in additional  
10    cost per home is not a small adjustment. It's major  
11    financial hurdles. For a core contractor like us, it  
12    means, like, fewer homes being built and fewer jobs to  
13    go around and more pressure on already-tight budget.

14          And for working families, it could mean  
15    the difference between buying homes and being priced  
16    out completely -- completely.

17          The base on the 2024 IECC already  
18    represents a meaningful step toward energy  
19    efficiencies. I respectfully ask DNREC to adopt the  
20    base code without the extra provisions, the path that  
21    support both sustainability and economic realities.

22          I truly appreciate the thoughtful  
23    testimony I already heard today. I'm here to simply  
24    add my voice to the growing numbers of builders and



1 suppliers in residents who wants to see smart and  
2 practical progress, but -- policies that  
3 unintentionally set people back. Thank you for your  
4 time and for listening to my voice like others.

5 MS. SMITH: Thank you, Mr. Cho.

6 And lastly, we're going to circle back  
7 around to Mr. Kevin Brozyna.

8 MR. BROZYNA: Thank you very much.

9 Can -- can you hear me better now?

10 MS. SMITH: Perfect.

11 MR. BROZYNA: I'm sorry about that  
12 earlier.

13 MS. SMITH: It's fine.

14 MR. BROZYNA: Okay. Well, good  
15 evening. My name is Kevin Brozyna, and I work with  
16 K. Hovnanian Homes in Smyrna, Delaware. Thanks to  
17 DNREC for the collaboration to date on conversations  
18 and -- and the opportunity to speak this evening.

19 Today I'm recommending that Delaware  
20 adopt the 2024 IECC building code as written without  
21 the zero-energy-capable supplement requirements.

22 This approach meaningfully advances  
23 energy efficiency in new construction and keeps  
24 Delaware still at the forefront nationally and

1 balances the progress with responsibility by not  
2 risking unintended harm to homeowners, builders in our  
3 community from premature aggressive zero-energy  
4 mandates.

5 Just some background. I'm a home  
6 builder. I've personally built hundreds of Zero  
7 Energy Ready homes right here in Delaware over the  
8 past eight years. I'm a award winner of the National  
9 Housing Innovation Award for construction of Zero  
10 Energy Ready homes multiple years in a row.

11 As an experienced builder that has  
12 dedicated my career to advancing building performance,  
13 my testimony is not conjecture. I understand the  
14 real-world requirements for successful implementation  
15 of advanced building performance, from training and  
16 trade coordination to quality assurance, cost control,  
17 and even educating homeowners after the sale.

18 I'm deeply committed to advancing  
19 energy efficiency and sustainable housing. However,  
20 as currently drafted, the rapid adoption of  
21 zero-energy-capable mandates without the necessary  
22 infrastructure in -- in place creates fundamental  
23 risks, especially concerning the health of residents.

24 Two areas of the most serious risks

1 are, you know, related to HVAC and poor moisture  
2 management. Highly efficient homes are susceptible to  
3 failures in these areas when unskilled parties try to  
4 implement advanced practices without proper training.  
5 Both of these can lead to significant indoor air  
6 quality and building durability problems.

7 Advocates for strong codes must  
8 prioritize occupant health and building durability,  
9 not just unsubstantiated energy targets. True market  
10 demand exists for high-performance homes. Allow the  
11 market to dictate that and consumers to seek out and  
12 choose from qualified builders who are knowledgeable  
13 on how to effectively deliver these homes.

14 We have to understand the extent of the  
15 stakeholder impact -- stakeholders impacted, including  
16 building code plan reviewers and inspectors, advanced  
17 equipment suppliers, trained trade partners,  
18 efficient -- energy-efficient appraisers and lenders.

19 If we don't properly build the process  
20 with all these players in mind, we would be like -- be  
21 like building walls and the roof of a house without  
22 first putting a foundation under it. It may look  
23 good, but there's no structure to support or sustain  
24 it.

1                   While I commend the State and  
2     department goals of improving efficiency of the built  
3     environment, I urge the efficiency advocates, groups,  
4     and governing parties to understand the balance  
5     between efficiency and imposing overly burdensome  
6     requirements.

7                   Please support the implementation of  
8     the '24 IECC as the new code and work with industry  
9     stakeholders to carefully evaluate and plan for future  
10    implementation of the advanced goals.

11                  MS. SMITH: Thank you, Mr. Brozyna.

12                  As we conclude the hearing, I want to  
13    thank you all for joining tonight. That does conclude  
14    the comment portion of the hearing as well. Again, if  
15    you wish to submit your comment in writing, please  
16    provide -- so by the instructions that were given  
17    earlier, there will be a screen shared soon that will  
18    provide that information for you on how to submit your  
19    written comments.

20                  And especially for those who were not  
21    able to submit their written comment -- sorry -- who  
22    were not able to finish their verbal comments, please  
23    submit your comments in writing.

24                  Ms. Burnette, can I have you share the

1 last screen, please?

2 There it is for you. So that's the  
3 ways that you can submit the written comment. And you  
4 will have to do so by August 6, 2025, in order for it  
5 to be made a part of the hearing record.

6 The hearing is now concluded at  
7 6:53 p.m. Thank you.

8 (Whereupon, the meeting concluded at  
9 6:53 p.m.)

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CERTIFICATE

I, CARLO FLORIO, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

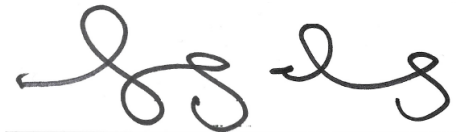


CARLO FLORIO

Notary Public in and for the  
State of Delaware

CERTIFICATE OF TRANSCRIBER

I, SONYA SOWERBY, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

A handwritten signature in black ink, appearing to read 'Sonya Sowerby', is written over a horizontal line.

SONYA SOWERBY

<b>&amp;</b>	4:21,23 5:5,10	<b>21</b> 24:18 30:14	<b>408.2.3</b> 38:19
<b>&amp;</b> 2:15 30:5	5:11	<b>2101</b> 1:4 5:10	<b>408.2.5</b> 38:23
<b>0</b>	<b>18th</b> 17:22	8:1 9:2	<b>44</b> 34:24
<b>0.25</b> 23:16	<b>19901</b> 1:17	<b>22</b> 1:11 6:3	<b>490</b> 30:11
38:10,12	<b>1st</b> 16:11 39:13	<b>23</b> 22:19	<b>5</b>
<b>0.40.</b> 38:11	<b>2</b>	<b>24</b> 34:16 35:1	<b>5</b> 4:12 38:23
<b>0008</b> 1:7	<b>2</b> 4:6 38:23	36:6 48:8	<b>5,000</b> 39:2
<b>008</b> 7:24	<b>2,062</b> 32:9	<b>25</b> 38:7	<b>50,000</b> 44:9
<b>1</b>	<b>2,255</b> 26:7	<b>28210</b> 51:14	<b>501</b> 27:11
<b>1</b>	<b>2,400</b> 23:13	<b>3</b>	<b>550</b> 26:2,12
<b>1</b> 4:4 18:4,5	<b>2.9</b> 26:5	<b>3</b> 4:7 27:11	<b>6</b>
38:19	<b>20</b> 35:3	<b>30</b> 36:9 40:5	<b>6</b> 4:15 6:3
<b>1,150</b> 30:11	<b>20,000</b> 41:8,9	44:9	11:13 49:4
<b>1,600</b> 26:7	<b>2004</b> 24:18	<b>30,000</b> 44:9	<b>6,000</b> 22:20
<b>1,632</b> 32:9	<b>2007</b> 35:2	<b>31</b> 14:3 21:18	<b>61</b> 26:13
<b>10</b> 4:20 25:22	<b>2020</b> 25:6	<b>315</b> 40:14	<b>6:00</b> 1:12
<b>11</b> 4:22 30:13	<b>2021</b> 4:11	<b>32636</b> 50:16	<b>6:53</b> 49:7,9
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