



Ed Landon
Department of Housing and Community Development
State of Maryland
100 Community Place
Crownsville, MD 21032

RE: Comments in Support of Proposals to Update Maryland State Building Code

Northeast Energy Efficiency Partnerships (NEEP) is a regional non-profit organization founded in 1996 whose mission is to promote the efficient use of energy in homes, buildings, and industry throughout the Northeast and Mid-Atlantic through regionally coordinated programs and policies that increase the use of energy efficient products, services and practices, and help achieve a cleaner environment and a more reliable and affordable energy system. NEEP's Building Energy Codes Project, one of NEEP's oldest initiatives, helps the region to increase building energy efficiency by providing technical resources and assistance to states to develop, implement, and comply with building energy codes.

NEEP plays an active role in supporting energy code adoption in Maryland. We have assisted with the State's last few code updates and provide direct technical support to the Department of Housing and Community Development on building energy code inquiries. We have also helped to support code compliance enhancement activities in the State.

Support for Adoption of the 2015 IECC

NEEP strongly supports the State of Maryland's efforts to create a better energy future for its citizens by proposing to adopt the 2015 International Energy Conservation Code (IECC). NEEP applauds the State for recognizing energy codes as a cost-effective source of long-term energy savings.

Federal Determinations: In its [determination on ASHRAE 90.1-2013](#) (which is included by reference in the commercial portion of the 2015 IECC), the US Department of Energy (DOE) found that the new commercial code provides an average energy savings of about eight percent over ASHRAE 90.1-2010. For residential buildings, DOE's recently-released [draft determination on 2015 IECC](#) indicates energy savings of just over one percent beyond the 2012 IECC.

Maryland and its citizens stand to benefit from the adoption of the 2015 IECC in many ways:

- The 2015 IECC is the final product of a well-developed, long-standing model code development process that involves the nation's leading experts in energy efficiency, building design and product performance professionals, state and local governmental officials, product manufacturers, architects, and builders.
- By adopting the 2015 IECC, the State of Maryland will stay on track with its energy efficiency goals and provide benefits to its building and home owners and tenants for many years. New construction is the most cost-effective time to install better insulation, quality windows and doors, and efficient heating and cooling equipment that is properly sized. The increase in construction costs should be reduced over time through economies of scale, as suppliers and retailers reduce inventories and streamline production to meet these new energy targets.



Opposition to Weakening Amendments to the 2015 IECC

NEEP opposes any amendments to the 2015 IECC that serve to reduce the energy savings achieved by the model code. The following provision is a new addition to the residential section of the 2015 IECC that warrants particular attention:

- *Energy Rating Index (ERI) thresholds:* NEEP strongly recommends that Maryland maintains the 2015 IECC consensus ERI threshold either adopting a common statewide index of 54 (the required index for Climate Zone 4) or by leaving the code unaltered to allow Garrett County (which is in Climate Zone 5) to comply with an index of 55. Increasing these index thresholds would weaken the code and could upset the equivalence of the different code pathways.

Conclusion

Adoption of the 2015 IECC serves several essential goals:

- Improves the thermal efficiencies of wall, roof, floor and basement construction, and of window and door performance for buildings that all combine to lower energy bills and provide healthier environments for owners and tenants of new and renovated commercial buildings within the State;
- Requires water heating lighting, and mechanical equipment efficiencies that will serve consumers through additional reductions in their utility bills;
- Reduces the need for utilities to construct additional generation and transmission capacity improvements to meet increases in electrical demand;
- Clarifies and streamlines certain provisions, notably requirements for existing buildings.

Weakening amendments notwithstanding, NEEP wholeheartedly endorses adoption of the 2015 IECC as an essential component of the State of Maryland's overall energy efficiency goals and is available to assist in answering inquiries about any aspect of IECC adoption and implementation. Please do not hesitate to contact NEEP for technical support and assistance in this effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Rose', with a horizontal line extending to the right.

Kevin Rose
Building Energy Technical Associate
NEEP - Northeast Energy Efficiency Partnerships
91 Hartwell Avenue, Lexington, MA 02421-3137
781-860-9177 Ext.158 krose@neep.org