

From: Wu, Cornelia <Cwu@NEEP.org>
Sent: Thursday, March 17, 2022 12:21 PM
To: CodesStandards, DAS
Cc: Port, Darren; Krim, Andrea
Subject: NEEP Comments Supporting 2021 IECC in CT - March 2022
Attachments: [NEEP Comments Supporting 2021 IECC in CT - March 2022.pdf](#)

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To: Department of Administrative Services
Office of the State Building Inspector

Please find attached the Northeast Energy Efficiency Partnerships (NEEP)'s Comments in Support of Connecticut Adoption of the 2021 International Energy Conservation Code.

Thank you,
Cornelia Wu

Cornelia Wu, RA, LEED AP
Building Policy Manager
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Submitted via Email

Louis J. Free
Chairman, Code Amendments Subcommittee
Department of Administrative Services
Office of the State Building Inspector
450 Columbus Boulevard, Suite 1303
Hartford, CT 06103

RE: NEEP Comments in Support of Connecticut Adoption of 2021 International Energy Conservation Code

Dear Chairman Free,

The Northeast Energy Efficiency Partnerships (NEEP) submits the following comments in response to the request for public comment in the Notice of Intent to Adopt the 2022 Connecticut State Building Code. NEEP strongly supports the State of Connecticut's efforts to create a better energy future for its residents and businesses by adopting the 2021 International Energy Conservation Code (IECC) for residential and commercial construction.

NEEP is a non-profit with a mission to accelerate regional collaboration to promote advanced energy efficiency and related solutions in homes, buildings, industry, and communities. With the goal to assist the region's leaders to reduce building sector energy consumption and carbon emissions, our vision is that the region's homes, buildings, and communities will be transformed into efficient, affordable, low-carbon, resilient places to live, work, and play.

Support for Adoption of the 2021 IECC

Connecticut and its residents and businesses stand to benefit from the adoption of the 2021 IECC in many ways, including the following:

- By adopting the 2021 IECC, Connecticut will stay on track with energy efficiency and emissions reduction goals. The code will provide energy and cost savings to its building and homeowners and individual 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 appropriately sized. Construction costs for these better quality products should be reduced through economies of scale, as suppliers and retailers reduce inventories and streamline production to meet these new energy targets.
- Air sealing, ventilation, moisture control, and indoor air quality provisions in the IECC conserve energy and provide health and safety benefits to the occupants of the building.



Recommendation

NEEP encourages the removal of any amendments to the 2021 IECC that make the code less stringent. Such modifications reduce the energy savings achieved by the model code. The code as proposed includes a weakening amendment in section R402.4.1.2. This state amendment allows sampling of air leakage in buildings with more than seven units. Regardless of the number of units, all building owners and occupants deserve to benefit equally from the 2021 IECC model code improvements.

Conclusion

Adoption of the 2021 IECC serves these essential goals:

- Connecticut will be on track to achieve the General Assembly's goal of reducing greenhouse gas emissions by at least 45% by 2030 and at least 80% by 2050.
- Improves the thermal performance of the wall, roof, floor and basement construction, and of window and door performance that all combine to lower energy bills and provide healthier environments for owners and tenants of new and renovated buildings within the state;

The benefits of these code changes will be immediate and continuous savings for both businesses and residences throughout the state. They also will hold down the increasing costs of energy from higher demand that would occur if not adopted and reduce continued reliance on older and more expensive power generators, a leading contributor to increased energy bills in our Mid-Atlantic and Northeast states. High energy bills disproportionately affect vulnerable populations, creating an excess energy burden on those who can least afford it. In the interests of equity, we encourage the adoption of the 2021 IECC without weakening amendments.

NEEP wholeheartedly endorses the proposed adoption of the 2021 IECC as an essential component of Connecticut's overall energy efficiency goals. We encourage the Commission to apply a consistent set of requirements in the statewide energy code that meet or exceed the provisions of the 2021 IECC. NEEP is available to answer inquiries about any aspect of IECC adoption and implementation. We also recognize that these changes require the education of the construction industry workforce to learn the most cost-effective ways to achieve these goals. 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 'Cornelia Wu', is written over a light blue horizontal line.

Cornelia Wu
Building Policy Manager
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