

RE 188 Will Result in Significant Energy Savings, Flexibility, and Simplified Enforcement
Support RE 188-13 as Modified by Public Comments 2 and 3

To Whom It May Concern:

We, the undersigned organizations, represent small and large home builders, environmental and efficiency advocates, product manufacturers, utilities, contractors, energy efficiency service providers, and others¹ who support RE 188-13 as modified by public comments 2 and 3. RE 188-13 would result in significant energy savings to homeowners at lower costs, while providing flexibility to homebuilders.

RE 188-13 would establish a new performance compliance path for the 2015 International Energy Conservation Code (IECC) that would utilize an Energy Rating Index (ERI)

score. The ERI score is defined as a numerical score where 100 is equivalent to the 2006 IECC and 0 is equivalent to a net zero home. The current HERS (Home Energy Rating System) rating is compatible with the ERI as defined in RE-188. A builder could comply by meeting a target ERI score, as defined in the proposal.

Required ERI Score	
Climate Zones 1-3:	59
Climate Zones 4-5:	63
Climate Zone 6:	62
Climate Zones 7-8:	60

RE 188-13 also requires compliance with mandatory measures, the prescriptive envelope requirement of the 2009 IECC, and hot water pipe insulation requirements.

RE 188-13 would result in significant, cost-effective energy savings. According to analysis by the Natural Resources Defense Council, RE 188-13 would reduce energy use by almost 20% compared to a home built to the 2012 IECC with current minimum equipment, saving the homeowner an average of approximately \$300 per year on their energy bills. The incremental down payment needed to achieve these savings would pay back in just over 6 months on average.

RE 188-13 would provide greater flexibility to builders allowing them to select measures with the best performance at the lowest cost for each home. The Leading Builders of America estimated that a home that costs \$3,000 extra to build for energy efficiency obtained through prescriptive methods only costs \$1,300 for the same performance obtained by the proposed approach.

RE 188-13 would ease code enforcement. RE 188-13 would give the code official the option of accepting third-party documentation for meeting these requirements in lieu or in addition to making the inspections.

We urge you to support RE-188 as modified by public comment X and X.

Sincerely,

Britt Makela Group

¹ Please suggest an additional category if the listed ones do not apply to you.

Institute for Market Transformation

Leading Builders of America

Natural Resources Defense Council

Residential Energy Services Network (RESNET)