



313 East Broad Street, Suite 212  
Richmond, VA 23219

Erik Johnston, Director  
Department of Housing and Community Development  
600 East Main Street, Suite 300  
Richmond, VA 23219

April 2, 2020

Dear Erik:

On behalf of the Virginia Energy Efficiency Council (VAEEC), I am writing in support of the draft Uniform Statewide Building Code (USBC). The draft USBC is the culmination of discussions among various stakeholders, including energy efficiency advocates, homebuilders, code officials and fire officials, under the guidance of the Department of Housing and Community Development.

The VAEEC and our members have been actively engaged in this process over the last several cycles. As the voice for the energy efficiency industry in the Commonwealth, our goal is to ensure that energy efficiency is an integral part of Virginia's economy. In partnership with over 100 members, which include fortune 500 companies, small businesses, nonprofits, local governments, state agencies, utilities and individuals, we are working to assess and support programs and policies that advance Virginia's energy efficiency industry.

In short, the VAEEC knows that investments in energy efficiency mean new jobs in every corner of Virginia. And we have built a lot of momentum in recent years. Recent reports indicate that energy efficiency is the leading sector of the clean energy industry, supporting approximately 78,000 jobs. Greater investments and growth in energy efficiency means more jobs in the local communities - jobs that cannot be outsourced.

Incorporating strong energy efficiency measures in the USBC is one such policy. In the last code update cycle, we were able to successfully push for the inclusion of the rigorous energy efficiency measures into the final USBC, such as reducing the allowable leakage of air from newly-installed air ductwork, and requiring mechanical- or duct-blaster- testing to measure that leakage. The current draft USBC builds on that momentum with additional key efficiency measures, including: blower door testing requirements for all new homes, increased efficiency requirements for new windows, allowing the use of DOE software to ensure compliance with state energy codes, and requiring a certificate on the electrical box that includes energy details of the home, which will help with future HVAC replacement when needed.

The blower door testing requirement is a big step in the right direction. According to a DOE Field Study conducted by Viridiant, in conjunction with the Southeast Energy Efficiency Alliance, 25% of new homes are failing to meet the current air leakage requirements in the USBC. Every newly-built home in Virginia should meet the minimum code standards set forth in the USBC, and mandatory blower door testing will help achieve that.

While we are pleased to see increased efficiency measures incorporated into the draft regulations, there is still work to be done to incorporate all efficiency measures from the international model code in the final USBC. For example, increased insulation requirements for ceilings and walls have been part of the international model code since 2012 and is the single largest efficiency gain of any one proposal. Based on analysis from the Responsible Energy



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Codes Alliance, homeowners will benefit from roughly \$78-\$103 annual energy cost savings from increased insulation requirements as compared to a home built to Virginia's current energy code. However, Virginia continues to require less efficient insulation requirements for walls and ceilings. VAEEC members have been holding information sessions throughout Virginia with homebuilders to help them better understand what would be required with an increase in the insulation R-value. We hope to see some improvements to the insulation requirements in the final USBC.

Increased energy efficiency requirements in the USBC means more homes are being built with enhanced cost-saving benefits, which is something everyone should be able to support.

Respectfully,

Chelsea Harnish  
Executive Director