



**Comments of Kevin Rose, Building Energy Technical Associate
Northeast Energy Efficiency Partnerships (NEEP)
To the Vermont Building Energy Standards Update team
Regarding the most recently proposed 2014 RBES-CBES adoption
September 26, 2014**

Kelly Launder, Barry Murphy, and other members of the code update team:

On behalf of Northeast Energy Efficiency Partnerships (NEEP)¹, thank you for the opportunity to provide comment on Vermont's most recently proposed 2014 RBES-CBES adoption, as presented at the hearing held on September 19, 2014. NEEP was founded in 1996 as a non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency in the building sector through public policy, program strategies and education. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

Support for Adoption of the 2015 IECC and Opposition to Weakening Amendments

As noted in our previous comments², NEEP supported the adoption of the 2015 International Energy Conservation Code (IECC) as the basis of the State of Vermont's building energy code. However, the proposed substantial weakening amendments to the 2014 Residential Building Energy Standards (RBES) explained below compromise this intention.

By weakening the residential 2015 IECC, *Vermont will also likely forfeit privileges it stood to receive from the US Department of Energy*. Specifically, NEEP has facilitated a special technical analysis of the Vermont 2014 RBES (once completed) compared to the 2015 IECC, which DOE/PNNL agreed to perform based on its potential value to not only Vermont but the region. However, the current incarnation of RBES would not present an upgrade for many of the states in our region, which greatly detracts from the value proposition of the proposed assessment.

Elaboration on Building Air Leakage and Energy Rating Index Recommendations

Our previous comments also highlighted two major weakening amendments in the proposed RBES draft: (1) removing all air leakage testing from the base code and (2) inflating the base and stretch code target Energy Rating (e.g. HERS) Indices contrary to the levels set in the 2015 IECC. While we recognize that the code update team has reviewed both of these topics and declined to make any changes, we maintain that these are worthwhile items to reconsider.

Regarding blower door testing: NEEP suggests incorporating a phased in air leakage tightness requirement. Given the perceived lack of statewide blower door coverage, a phased in approach would provide the State with time grow this workforce through a robust training program. The direct

¹ [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. The comments are presented by NEEP staff and don't necessarily reflect the views of NEEP's Board, sponsors or partners.

² [Support for Vermont Adoption of the 2015 IECC](#). Submitted 9 July 2015.



alternative to capitalizing on this opportunity to develop the state's green building workforce is the burdening of Vermont homeowners with higher energy and health costs due to the loss of conditioned air leaking out of the home and the decreased control over the source and quality of the air leaking in through.

Regarding HERS Indices: The increased targets will result in more homes towards using the Energy Rating Index compliance path, which requires blower door testing. This seems counterintuitive considering the perceived lack of capacity in the state to perform this testing.

Additional Recommendations

RBES FastTrack packages clarifications: First, NEEP proposed that "Prescriptive Packages" might be a more suitable name for the FastTrack packages, since use of the packages does not yield expedited permitting. While NEEP recognizes that changing the FastTrack name currently used in the 2011 RBES and the accompanying Handbook could cause confusion, but the current nomenclature currently confuses a simplified compliance path for a "fast" one. Second, the packages as currently presented seem to mandate that an air leakage rate of no more than 3 ACH-50; however, it was explained at the September 19 hearing that testing is actually not required if other prescriptive measures are exceeded. This should be clarified for the final version of the code.

Conclusion

NEEP hoped to trumpet Vermont's regional (and national) leadership in being one of the first states to adopt the 2015 IECC, but significant weakening amendments to the residential code stand to tarnish this distinction. Even minor improvements to the identified provisions would help to solidify Vermont's position as a leader in building energy efficiency. Specifically, the air leakage testing matter can either be viewed as a workforce growth opportunity or a homeowner burden inevitability.

NEEP is available to assist in answering inquiries about any aspect of IECC adoption and implementation. Please do not hesitate to contact us for technical support and assistance in these efforts.

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