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From: camellia watkins [camellia.watkins@sierraclub.org]
Sent: Monday, December 07, 2009 3:50 PM
To: IRRC
Subject: Comments for Dec. 10th meeting on IECC adoption
Attachments: PalECC09Comments12.07.doc

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Please accept the attached comments from the Sierra Club for the IRRC meeting to be held on December 10, 2009.

Thank you.

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Everybody needs beauty as well as bread, places to play in and pray in, where nature may heal and give strength to body and soul. ~John Muir



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Solving Global Warming One City at a Time

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Independent Regulatory Review Commission
State of Pennsylvania
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax number: (717) 783-2664

December 7, 2009

RE: Sierra Club Comments in support of Pennsylvania's adoption of the 2009 International Energy Conservation Code (2009 IECC)

Dear Commissioners:

The Sierra Club supports the adoption of the 2009 IECC as the minimum statewide energy code for residential construction in Pennsylvania. We believe that the 2009 IECC – without weakening amendments – should be a fundamental part of the state's energy future.

The IECC is the only code recognized in federal law and nationwide as the comprehensive model energy code for all residential buildings. More than two thirds of states have adopted the IECC as their mandatory statewide energy code. The successful adoption and implementation of the 2009 IECC will ensure that Pennsylvania qualifies for almost \$100 million in allotted State Energy Program (SEP) federal stimulus funding from the U.S. Department of Energy (DOE) (<http://www.energy.gov/pennsylvania.htm>). Moreover, the code will benefit the state for years to come by reducing building energy consumption and pollution, increasing utility system reliability, creating a more comfortable living and working environment for Pennsylvania's citizens, and saving homeowners and businesses money in reduced energy bills, thereby stimulating the state economy. In addition the 2009 IECC will facilitate compliance and enforcement of the code, and will allow builders to take advantage of free Department of Energy trainings, free compliance software like REScheck, and other programs. These programs do not apply to the *IRC* or any state-created energy codes.

We understand that Pennsylvania also intends to adopt the 2009 International Residential Code (2009 IRC), which includes an alternative energy compliance path. DOE has determined that this path is not equivalent to the 2009 IECC and thus does not meet the requirements of the Recovery Act. The Sierra Club recommends that the state adopt only the 2009 IECC in order to stay compliant with the Recovery Act and remain eligible for all SEP funding.

Energy efficient buildings avoid global warming, reduce demand on the power grid and stress on natural gas supplies, improve local air quality, and save consumers money. The choices we make in designing and constructing new buildings will affect energy use for many decades to come. Building design and construction provide by far the best and most cost-effective opportunity to build in energy efficient features that will last for the lifetime of the building. By adopting the 2009 IECC, Pennsylvania will stay on track with statewide energy efficiency goals and will guarantee homeowner benefits for many years. On behalf of the National Sierra Club Cool Cities Program I strongly urge the adoption of the 2009 IECC.

Respectfully,

Camellia Watkins
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