

**Comments in response to the Tennessee Department of Commerce and Insurance
Notice of Public Hearing to Solicit Comments regarding adoption of minimum
standards for one- and two-family dwellings.**

Submitted to: Commissioner Leslie Newman
Tennessee Department of Commerce and Insurance
500 James Robertson Pkwy
Davy Crocket Tower
Nashville, TN 37243

Date:

Submitted by:

I respectfully submit these comments in response to the Notice of Public Hearing to Solicit Comments regarding the adoption of statewide minimum energy efficiency standards for one- and two-family dwellings, as authorized by the Tennessee Clean Energy Future Act of 2009. I strongly encourage the adoption of the 2009 International Energy Conservation Code (2009 IECC). The adoption of the 2009 IECC will provide greater efficiency levels, and therefore greater benefits, than the 2006 or 2009 International Residential Code (IRC) that are also being considered.

Given the fact that Tennessee has the second highest per-capita residential electricity consumption in the nation,¹ adopting efficiency standards for one- and two-family dwelling presents a significant opportunity to reduce energy usage across the state. In combination with energy efficient appliances, energy codes can lock in cost-effective energy savings of 30 to 40 percent over standard practices. The money saved on energy bills keeps more money in local economies, provides relief to low-income residents struggling with high energy bills, reduces air pollution and greenhouse gas emissions, and reduces our reliance on foreign energy sources. In order to maximize these benefits, I encourage adoption of the code that provides the greatest efficiency: the 2009 IECC.

As energy prices continue to increase, building energy efficient structures will become more and more important. Energy efficiency is the cheapest, fastest, cleanest way to meet future energy demand. The Tennessee Clean Energy Future Act, which authorizes this rulemaking, recognizes the opportunity for residential energy efficiency measures to contribute significant benefits to the citizens of Tennessee. The 2009 IECC provides the greatest energy savings, helping to ensure the clean, safe, reliable and affordable energy supply that the Tennessee Legislature has identified as critical to the prosperity of Tennessee's economy.

Adopting the 2009 IECC will also help encourage local jurisdictions to follow suit, so that cities and counties currently enforcing a less stringent energy code can update to the 2009 IECC with confidence that they are increasing the efficiency of residential structures while

¹ According to 2006 EIA data

not disadvantaging local builders with disproportionately stringent requirements. In this way, the statewide adoption of the 2009 IECC will lay the groundwork for improved residential energy codes in all local jurisdictions of Tennessee.

The greater efficiency provided by the 2009 IECC, as opposed to the 2006 or 2009 IRC, also provides a stronger foundation for the growing clean-energy sectors of Tennessee's economy. Clean energy technologies, such as solar applications, are rapidly becoming a significant part of Tennessee's economy, creating jobs and stimulating economic growth. These technologies provide greater benefits and are more cost-effective when installed in conjunction with an efficient building envelope. Adopting the 2009 IECC will further accelerate their continued development and contribution to Tennessee's economic growth.

Finally, the 2009 IECC maintains the state's eligibility for State Energy Program (SEP) funding through the American Recovery and Reinvestment Act. The \$63.5 million in SEP funds that Governor Bredesen has accepted to develop the Volunteer State Solar Initiative promises to bring added jobs and economic growth to Tennessee. The federal Department of Energy has ruled that the 2006 or 2009 International Residential Code (IRC) will not satisfy this requirement. Therefore, the 2009 IECC should be the preferred code for statewide adoption pursuant to this rulemaking.

In all, the adoption of the 2009 IECC makes sense for the state of Tennessee. It will save residents significant amounts of money, accelerate Tennessee's economic growth and help ensure a reliable, affordable, and safe energy supply while providing environmental benefits to the state and region. These benefits would either be reduced or not available with the adoption of other residential energy codes such as the 2006 or 2009 IRC. Therefore, it is in the best interest of the citizens of Tennessee that the Department of Commerce and Insurance adopt the 2009 IECC, without significant amendment, for statewide enforcement by the Division of Fire Prevention.

Thank you,