May 10, 2019

State Fire Marshal
West Virginia State Fire Marshal’s Office
1207 Quarrier Street, Second Floor
Charleston WV 25301

RE: Residential Energy Codes & 2015 IECC Standards

Dear Mr. Tyree:

The Building Performance Association (the “Association”) has been created to combine the expertise and resources of the Home Performance Coalition, Efficiency First, and Home Energy magazine to better advance the home and building performance industry through advocacy, education, community building and publications. As an industry trade organization that includes residential energy efficiency contractors and inspectors, the Association hopes our recent reorganization will help expand our partnerships with state-based contractors, inspectors and affiliated organizations.

We are writing on behalf of our members and affiliates to voice the Association’s support for increasing West Virginia’s statewide residential energy codes to meet 2015 IECC standards.

We applaud Governor Justice’s February 14, 2018 signature of Senate Bill 177 adopting the Legislative Rule filed by the Fire Commission on July 25, 2018. Amending the State Building Code to update the ANSI/ASHRAE/IESNA Standard 90.1 from the 2007 edition to the 2010 edition is an important milestone of progress on energy efficiency. We salute West Virginia’s leadership on updating these critical commercial building standards. We urge you to continues this progress on West Virginia’s residential energy codes in 2019 and beyond.

The primary goal of an energy code or standard is to conserve energy. Commercial buildings and residential households in the United States consume nearly 50% of the nation's total primary energy and 70% of the nation's electricity. In a series of reports released initially in 2007, the McKinsey Global Institute found that America could reduce energy use in new and existing buildings by more than one quarter with measures that pay for themselves within 10 years. These McKinsey Reports - and related economic cost-curve analyses - cited state energy code adoption as one of the most cost-effective approaches for enabling new and renovated residential and commercial structures to achieve energy efficiency savings.
Adopting the 2015 IECC standards in West Virginia’s residential energy codes will reduce utility costs, improve indoor air quality and reduce emissions—protecting consumers and bolstering the economy. More modern energy code provisions reduce heating and cooling costs, not only making comfortable living conditions more affordable, but also putting money back into the pockets of West Virginia’s consumers.

Additional funds allow consumers to spend more on other goods and services—individuals have more money to spend on items in the local economy and business owners have more money to spend on business improvements, including investments and employee benefits. More data, information and research on these economic benefits are available at the American Council for an Energy-Efficient Economy’s web site at: https://aceee.org/topics/building-codes.

We believe it is imperative that West Virginia align its residential building codes with its neighboring states that have seen increased home values and significant job creation from higher building standards. This includes proper testing of homes to ensure quality, safe, and affordable construction for years to come.

We believe the advancement of West Virginia’s residential energy codes from 2009 IECC standard to the 2015 IECC standards is in the best interest of our members, affiliates and the consumers they serve. Modern energy codes increase housing quality, improves communities, and ensures the safety of occupants.

Thank you for the opportunity to comment and please call or email should you have any questions.

Sincerely,

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