

BEFORE THE NEVADA ENERGY COMMISSIONER
COMMENT/REPLY COMMENT INFORMATION FORM

Rulemaking to adopt, amend, or repeal)
regulations pertaining to Chapter 701)
of the Nevada Administrative Code related)
to the conservation of energy in buildings,)
including manufactured homes, adoption)
of 2009 IECC pursuant to Nevada Revised)
Statutes 701.220.)
_____)

Please complete the following information and submit this form along with your comments¹:

Date of Filing: September 12, 2011

Method of Filing: via Email U.S. Postal Mail Fax

Name of Person Commenting: Frank Kiesceker

Name of Organization (if applicable): ACH Foam Technologies

Address: 5250 North Sherman Street
Denver, CO 80216

Phone Number: (303) 297-3844

Fax Number: (303) 292-2613

Email address:

Do you wish to be placed on the email service list for this matter to receive any further notices? (Mark One)

Yes No

Note: Submitted comments are part of the public record for the rulemaking and may be posted on the web.

¹ Please refrain from making any changes to this form. Thank you.

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NEVADA STATE OFFICE
OF ENERGY

September 8, 2011

Director Stacey Crowley
Nevada State Office of Energy
755 North Roop Street, Suite 202
Carson City, NV 89701

RE: Comments Supporting the Adoption of the 2009 IECC in Nevada

Dear Director Crowley:

ACH Foam Technologies is a manufacturer that operates in Nevada and we urge your support of updating Nevada's construction codes to incorporate the 2009 International Energy Conservation Code (IECC).

The 2009 IECC has been found to be a substantial improvement over the state's current building practice. Energy savings resulting from the upfront investment in energy efficient technology benefits the homebuyer monetarily from the moment they move into their home. Homeowners quickly recoup their investment as the realized savings on their energy bills quickly offsets any additional construction costs related to the installation of energy efficient products.

Most new homes in Nevada are built using outdated energy codes, which for homeowners, translates into higher energy bills and additional needed home repairs. According to the U.S. Department of Energy, adopting this simple energy code update would result in **homeowner savings of 13 to 17 percent every year – or \$205 to \$252** on their energy bills. Energy is one of the biggest expenses of homeownership and will continue to put a strain on household income as energy prices continue to rise. Smaller utility bills will help families, especially those with lower incomes, to continue to maintain and afford their homes.

Extensive analysis by the Building Codes Assistance Project (BCAP) shows that energy code adoption is not a significant cost burden of builders, \$777.15 on average, less than 1% of the cost of the home. Energy efficient improvements are less expensive if they are done when the building is initially constructed as costs can be rolled into the homebuyer's mortgage, easing any burden of additional cost by not requiring any outlay expenditures. When you spread the builder's cost over a typical 30-year

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loan and factor in average energy savings of \$228.50, homeowners will realize net savings in just 10 months.

Updating the energy code to the 2009 IECC will also increase demand for energy efficiency products in Nevada prompting the continued development of new energy efficiency products. This increased demand will boost the state's economy by creating new jobs and putting Nevadans back to work, including Nevada's insulation manufacturers, distributors, retailers, and residential efficiency professionals.

For the above stated reasons, ACH Foam Technologies urges the Nevada State Office of Energy to adopt the 2009 IECC without weakening amendments. .

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Kiesecker', written over a horizontal line.

Frank Kiesecker
Senior Vice President Sales and Marketing
ACH FOAM TECHNOLOGIES