

**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. )  
\_\_\_\_\_ )

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MAY 26 2011

NEVADA STATE OFFICE  
OF ENERGY

Please complete the following information and submit this form along with your comments<sup>1</sup>:

Date of Filing: 5-26-2011

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

Name of Person Commenting: Aleisha Khan (Executive Director)

Name of Organization (if applicable): Building Codes Assistance Project (BCAP)

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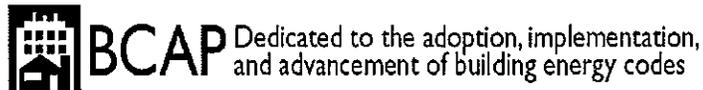
Email address: akhan@ase.org; pkarrer@ase.org

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.**

<sup>1</sup> Please refrain from making any changes to this form. Thank you.



Stacey Crowley  
Acting Commissioner  
Nevada Renewable Energy and Energy Efficiency Authority  
755 North Rook Road, Suite 202  
Carson City, Nevada 89701  
[energyefficiency@renewable.nv.gov](mailto:energyefficiency@renewable.nv.gov)  
Attn: **Emily Nunez**  
**Public Workshop Comments for 2009 IECC**

May 26, 2011

**VIA E-MAIL**

**RE: Comments of the Building Codes Assistance Project Supporting Adoption of the 2009 International Energy Conservation Code**

Dear Commissioner Crowley:

The Building Codes Assistance Project (BCAP) strongly supports the rulemaking process proposed by the Nevada Renewable Energy and Energy Efficiency Authority to adopt the 2009 International Energy Conservation Code (2009 IECC) for new and renovated residential and commercial construction. REEEA issued a public notice on May 16, 2011 regarding a public comment workshop scheduled for May 26, 2011.<sup>1</sup>

We believe that the IECC – without weakening amendments – will be a major advancement toward a more secure energy future for Nevada. Model energy efficiency standards will benefit the state for years to come by reducing building energy consumption, increasing utility system reliability, creating a more comfortable living and working environment for Nevada's citizens, and saving households and businesses money through lower energy bills.

Launched in 1994, BCAP is a non-profit organization and a joint initiative of the Alliance to Save Energy (ASE), the American Council of an Energy Efficient Economy (ACEEE), and the National Resource Defense Council (NRDC). BCAP provides custom-tailored assistance on building energy code adoption and implementation. We assist state and local regulatory and legislative bodies and help coordinate others representing environmental interests, consumers, labor, and industry. BCAP provides states with code advocacy assistance on behalf of the U.S. Department of Energy (DOE), and coordinates with DOE to provide technical assistance.

**American Recovery and Reinvestment Act**

BCAP strongly urges rulemaking to adopt and implement minimum residential and commercial energy standards that are equivalent to the latest national model energy codes to meet the requirements of the American Recovery and Reinvestment Act (Recovery Act). As a condition of accepting \$34.7 million in State Energy Program (SEP) federal funding from the DOE,<sup>2</sup> Nevada must adopt and implement residential and commercial building energy codes that meet or exceed the stringency of the 2009 IECC and ASHRAE Standard 90.1-2007.

**Residential Economic Benefits**

The 2009 IECC has been found to be a substantial improvement over the state's current building practice. A recent DOE study found that the implementation of the 2009 IECC in Nevada will save

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*A joint initiative of the Alliance to Save Energy, the Natural Resource Defense Council, and the American Council for an Energy Efficient Economy*



13 to 17 percent in energy consumption – or \$205 to \$252 in annual energy costs – for the average new house.<sup>3</sup> Furthermore, a BCAP analysis of the incremental costs of building to the 2009 IECC instead of current practice in Nevada yielded a conservative (upper bound) estimate of \$777.15. When this added cost is amortized over a standard 30-year mortgage and factoring in average estimated utility savings of \$228.50 annually, homeowners would see a payback period of just ten months.<sup>4</sup> Of course, homeowners would continue to enjoy those savings long after the improvements are paid for in full.

### Improved Energy Efficiency and the 2009 IECC

The 2009 IECC contains a number of improvements over its predecessor editions adopted regionally and statewide in Nevada. These provisions that enhance energy-efficiency include:

- A requirement for duct testing or that ducts be located inside conditioned space;
- Air leakage testing or visual inspection by a code official or approved third party;
- More stringent insulation levels for wood frame walls, basement walls, and mass walls;
- Stronger U-factor and SHGC levels for fenestration; and
- A first-time requirement for high-efficacy lighting.

### Steps Forward

Building energy efficiency should be a central component of Nevada's efforts to secure a stable and prosperous energy future. BCAP welcomes the opportunity to work with the state's appropriate agencies to support Nevada's implementation of the 2009 IECC. We offer our assistance to plan training and other implementation activities, should you so desire.

Regards,

Aleisha Khan  
Executive Director  
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[akhan@ase.org](mailto:akhan@ase.org)

<sup>1</sup> Nevada REEEA. [http://renewableenergy.state.nv.us/documents/Comments/2011-05-26\\_NoteWorkshop.PDF](http://renewableenergy.state.nv.us/documents/Comments/2011-05-26_NoteWorkshop.PDF)

<sup>2</sup> U.S. Department of Energy. <http://www.energy.gov/nevada.htm>.

<sup>3</sup> U.S. Department of Energy. *Impacts of the 2009 IECC on Residential Buildings at the State Level*. [http://www.energycodes.gov/publications/techassist/IECC2009\\_Residential\\_Nationwide\\_Analysis.pdf](http://www.energycodes.gov/publications/techassist/IECC2009_Residential_Nationwide_Analysis.pdf). (page 113-17)

<sup>4</sup> BCAP. <http://bcap-ocean.org/resource/incremental-cost-payback-nevada>