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November 11, 2011

RE: NASEO comments on the Request for Information (RFI), Docket No. EERE-2011-BT-BC-0046, Building Energy Codes Cost Analysis

The National Association of State Energy Officials (NASEO) appreciates this opportunity to provide the U.S. Department of Energy (DOE) with comments and suggestions on Building Energy Codes Cost Analysis. NASEO is a membership organization of the nation's 56 state and territory energy offices, which operate numerous residential and building related energy efficiency and financing programs across the country, including in a number of cases, authority over statewide building energy codes and beyond-code programs. Transparent energy codes cost analysis will help to promote progressively more stringent national energy codes and complement these state-administered energy efficiency programs, setting a more solid framework for future program enhancements and support for state energy policy initiatives, while also contributing to the broader efforts to reduce America's dependence on foreign oil.

NASEO supports DOE's efforts in soliciting public input on how it may better improve the methodology DOE intends to use for assessing cost effectiveness, including the energy savings assessment of changes to residential building energy codes. In addition, NASEO encourages DOE to further support the continued development of the International Code Council's (ICC) International Energy Conservation Code (IECC), the national model code adopted by or forming the basis of residential energy codes promulgated by a majority of U.S. states and territories, as well as other voluntary building energy codes.

In addition, NASEO encourages DOE to establish a consistent and transparent methodology for accessing the cost effectiveness of code change proposals and for assessing the cost effectiveness of new code versions. The release of information related to its cost effectiveness methodology, including cost and efficiency assumptions, inputs and modeling calculations, will better enable states, territories and all participants to understand how DOE has developed its information. As such, the states and territories will be in a better position to assess the effectiveness of their code adoption and implementation activities and possibly develop efforts around code enhancements or enactment of beyond-code energy efficiency programs.

As noted in the RFI, DOE proposes to utilize three primary steps in assessing the cost effectiveness of a proposed code change or a newly revised code. NASEO supports the dividing of the cost effectiveness calculation into the three steps of:

- 1) Estimating the energy savings of changed code provision(s),
- 2) Estimating the first cost/marginal cost of the changed provision(s), and

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3) Calculating the corresponding economic impacts of the changed provision(s).

This dedicated and transparent analysis of each of the three segments of cost effectiveness will better enable the states and territories to consider the code provisions based on their specific conditions, associated impacts and special factors.

NASEO believes that having a transparent cost effectiveness methodology that states and territories can use and refer to, will be of greater important in the future code development and adoption processes.

Regards,

A handwritten signature in blue ink, appearing to read "D. Terry", with a stylized flourish underneath.

David Terry
NASEO Executive Director