



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
AND ENVIRONMENTAL CONTROL

OFFICE OF THE  
SECRETARY

89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

PHONE: (302) 739-9000  
FAX: (302) 739-6242

**Secretary's Order No.: 2014-EC-0008**

**RE:            Approving Final New Regulation to adopt the most recent and/or highest available version of the International Energy Conservation Code, and the latest ASHRAE/IENSA Energy Standard as required by 16 *Del.C.* §7602, as well as 29 *Del.C.* § 8058, hereinafter to be known as 7 DE Admin. Code 103: State Energy Conservation Code**

**Date of Issuance: April 15, 2014**

**Effective Date of the Amendment: May 11, 2014**

Under the authority vested in the Secretary of the Department of Natural Resources and Environmental Control ("Department" or "DNREC") the following findings, reasons and conclusions are entered as an Order of the Secretary in the above-referenced rulemaking proceeding.

**Background and Procedural History**

This Order considers a proposed new regulation to adopt the most recent and/or highest available version of the International Energy Conservation Code and the latest ASHRAE/IENSA energy standard as required by 16 *Del.C.* §7602, as well as 29 *Del.C.* §8058. The proposed new regulation will hereinafter be known as 7 DE Admin. Code 103: State Energy Conservation Code.

Delaware's Energy Conservation Code Act (16 *Del.C.* §7602) requires DNREC to adopt the most recent and/or highest available version of the International Energy

*Delaware's Good Nature depends on you!*

Conservation Code (“IECC”), and the latest ASHRAE/IESNA energy standard. Such regulation must also set forth procedures for certification of compliance with these codes and standards to be utilized by the respective local governments.

On January 1, 2010, the 2009 IECC was adopted by the State of Delaware as a result of Delaware’s Energy Conservation Code Act. In January 2012, the most recent IECC and ASHRAE/IESNA energy standards were published. The Department’s Division of Energy & Climate (“DEC”), along with the Delaware Energy Codes Coalition and the Home Builders Association of DE, have reviewed these new codes extensively over the last year, and propose this new regulation to adopt the 2012 IECC and 2010 ASHRAE standards with amendments.

The Department’s Division of Energy & Climate commenced the regulatory development process with Start Action Notice 2013-27. The Department published its initial proposed regulation in the December 1, 2013 *Delaware Register of Regulations*. The Department then held a public hearing on January 6, 2014. The public hearing record remained open at that time for public comment through January 22, 2014.

The proposed new regulation seeks to enable the Department to (1) formally adopt the 2012 IECC and 2010 ASHRAE standards with amendments; and (2) set forth procedures for certification of compliance with these codes and standards to be utilized by respective local governments. The proposed new regulation was thoroughly vetted by the Department at the public hearing on January 6, 2014.

Pursuant to Delaware law, the record remained open for fifteen (15) additional days subsequent to the date of the public hearing, for the purpose of receiving additional public comment. Of the comment received, three voiced support for the Department’s

proposed regulation as proposed, and applauded Delaware's efforts to create a better energy future for its citizens. Four other organizations, while voicing support for the Department's efforts in this matter, suggested various modifications to the proposed regulations, in order to provide a greater clarity and understanding to the regulated community. The Department's DEC agreed with all such suggested changes, and amended the initial proposed regulations to reflect the same.

Comment was also received from the Homebuilders Association of Delaware ("HBADE"), which requested further changes to the proposed regulation. It should be noted that the Department had been working with HBADE for approximately nine months leading up to the drafting of these regulations, and both parties had come to agreement of the tiered thresholds as outlined in the proposed draft regulation. Subsequently, HBADE's comment asked for further weakening of the proposed regulation by increasing the square footage thresholds, which would reduce the energy savings to be achieved by the new code. The Department notes that the U.S. Department of Energy has ensured the cost-effectiveness of the new building air leakage requirements for all building sizes through rigorous analysis. Therefore, although the Department has carefully considered this proposal, DEC will not be implementing the additional changes proposed by HBADE.

It should also be noted that all proper notification and noticing requirements concerning this proposed promulgation were met by the Department. Proper notice of the hearing was provided as required by law.

The Department's presiding hearing officer, Lisa A. Vest, prepared a Hearing Officer's Report dated April 2, 2014 (Report). The Report recommends certain findings and the adoption of the proposed new Regulation, as attached to the Report as Appendix A.

### **Findings and Discussion**

I find that the proposed new Regulation is well-supported by the record developed by the Department, and I adopt the Report to the extent it is consistent with this Order. The Department's experts developed the record and drafted the proposed new Regulation. As previously noted, comment voicing support of this proposed action was received from the public that attended the hearing held on January 6, 2014.

I find that the Department's experts in the Division of Energy & Climate fully developed the record to support adoption of this new Regulation. The adoption of this Order will allow Delaware to (1) formally adopt the 2012 IECC and 2010 ASHRAE standards with amendments; and (2) set forth procedures for certification of compliance with these codes and standards to be utilized by respective local governments.

In conclusion, the following findings and conclusions are entered:

1.) The Department has jurisdiction under its statutory authority to issue an Order adopting this proposed new Regulation as final;

2.) The Department provided adequate public notice of the proposed new Regulation, and provided the public with an adequate opportunity to comment on the proposed new Regulation, including at the public hearing held on January 6, 2014;

3.) The Department held a public hearing on January 6, 2014 in order to consider public comment before making any final decision;

4.) The Department's Hearing Officer's Report, including its recommended record and the recommended new Regulation as set forth in Appendix A, are adopted to provide additional reasons and findings for this Order;

5.) The adoption of this Order will enable Delaware to adopt the most recent and/or highest available version of the International Energy Conservation Code ("IECC") and the latest ASHRAE/IESNA energy standard, as required by Delaware's Energy Conservation Code Act (16 *Del.C.* §7602);

6.) The recommended new regulation should be adopted as a final regulation because Delaware will be enabled to (1) adopt the 2012 IECC and 2010 ASHRAE standards with amendments; (2) formally set forth procedures for certification of compliance with these codes and standards to be utilized by respective local governments; and lastly, because (3) the proposed regulation is well supported by documents in the record;

7.) The Department shall submit this Order approving the final regulation to the *Delaware Register of Regulations* for publication in its next available issue, and provide such other notice as the law and regulation require and the Department determines is appropriate.



Collin P. O'Mara  
Secretary



## HEARING OFFICER'S REPORT

**TO:** The Honorable Collin P. O'Mara  
Cabinet Secretary, Department of Natural Resources and Environmental Control

**FROM:** Lisa A. Vest   
Public Hearing Officer, Office of the Secretary  
Department of Natural Resources and Environmental Control

**RE:** **Proposed New Regulation to adopt the most recent and/or highest available version of the International Energy Conservation Code, and the latest ASHRAE/IENSA Energy Standard as required by 16 Del.C. §7602, as well as 29 Del.C. § 8058, hereinafter to be known as 7 DE Admin. Code 103: State Energy Conservation Code**

**DATE:** April 2, 2014

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### **I. BACKGROUND AND PROCEDURAL HISTORY:**

A public hearing was held on Monday, January 6, 2014, at 6:00 p.m. at the Department of Natural Resources and Environmental Control ("DNREC", "Department"), 89 Kings Highway, Dover, Delaware to receive comment on a proposed new regulation to adopt the most recent and/or highest available version of the International Energy Conservation Code and the latest ASHRAE/IENSA energy standard as required by 16 *Del.C.* §7602, as well as 29 *Del.C.* §8058. The proposed new regulation will hereinafter be known as 7 DE Admin. Code 103: State Energy Conservation Code.

Delaware's Energy Conservation Code Act (16 *Del.C.* §7602) requires DNREC to adopt the most recent and/or highest available version of the International Energy Conservation Code ("IECC"), and the latest ASHRAE/IESNA energy standard. Such regulation must also set forth procedures for certification of compliance with these codes and standards to be utilized by the respective local governments.

On January 1, 2010, the 2009 IECC was adopted by the State of Delaware as a result of Delaware's Energy Conservation Code Act. In January 2012, the most recent IECC and ASHRAE/IESNA energy standards were published. The Department's Division of Energy & Climate ("DEC"), along with the Delaware Energy Codes Coalition and the Home Builders Association of DE, have reviewed these new codes extensively over the last year, and propose this new regulation to adopt the 2012 IECC and 2010 ASHRAE standards with amendments.

The Department has the statutory basis and legal authority to act with regard to the proposed new regulation, to wit: 7 DE Admin. Code 103, *State Energy Conservation Code*, pursuant to 16 *Del.C.* §7602. The proposed new regulation has been available for public review in the Department's DEC office in Dover, as well as having been published in the Delaware Register of Regulations, as of December 1, 2013. A legal notice regarding the availability and publication of the proposed regulation, as well as the scheduling of the public hearing held on January 6, 2014, was published in both the News Journal and the Delaware State News on December 11, 2013.

Members of the public attended the hearing held by the Department in this matter on January 6, 2014, and their comments will be addressed below. Proper notice of the hearing was provided as required by law.

## **II. SUMMARY OF THE PUBLIC HEARING RECORD:**

The public hearing record consists of the following documents: (1) a verbatim transcript; (2) six documents introduced by the Department as Exhibits 1-6 at the public hearing held on January 6, 2014, and marked by this Hearing Officer accordingly; (3) written comment/statement from the Home Builders Association of Delaware, marked by this Hearing Officer as "Home Bldrs. Assoc. of DE Exh. #1"; (4) the public comment received by the Department in this matter;

and (5) the Department's Technical Response Memorandum ("TRM"), prepared in response to the public comment received in this matter. The Department's person primarily responsible for the drafting and overall promulgation of these proposed amendments, Crystal Nagyiski, developed the record with the relevant documents in the Department's files.

Following the submission of the Department's exhibits into the record at the aforementioned public hearing, Ms. Nagyiski proceeded to offer a brief summary as to the Department's proposed actions in this matter (*see* Section I of this Report). It should be noted that, subsequent to the publication of this proposed new regulation, and based on comments and discussions with the Delaware Energy Code Coalition, Home Builders Association of Delaware, and Delaware Building Officials Association prior to the date of the January 6, 2014 public hearing, the Department proposed two changes to the initial proposed regulations: (1) clarification of the duct and envelope tightness ("DET") verifier by removing "BPI Analyst" and inserting "BPI Heating Professional"; and (2) removal of Section 4.1.3 (1) of the proposed regulation in its entirety, requiring a HERS score of 69 as part of the blower door testing thresholds. Ms. Nagyiski noted in her presentation that the proposed changes have been thoroughly vetted through the Delaware Energy Code Coalition, an extensive stakeholder group including Delaware builders, building code officials, energy auditors, national energy efficiency groups, and others.

Pursuant to Delaware law, the record remained open for receipt of public comment for an additional fifteen (15) days subsequent to the date of the public hearing held on January 6, 2014. During that time, public comment was received from several organizations from the regulatory community. These comments were reviewed in detail by the Department's DEC, and thoroughly addressed in the Technical Response Document dated February 14, 2014, which was provided to

this Hearing Officer on February 18, 2014. Of the comments received, three voiced support for the Department's proposed regulation as proposed, and applauded Delaware's efforts to create a better energy future for its citizens. Four other organizations, while voicing support for the Department's efforts in this matter, suggested various modifications to the proposed regulations, in order to provide a greater clarity and understanding to the regulated community. The Department's DEC agreed with all such suggested changes, and amended the initial proposed regulations to reflect the same.

Lastly, comment was received by the Department from the Homebuilders Association of Delaware ("HBADE"), which requested further changes to the proposed regulation. In its TRM, the DEC noted that the Department had been working with HBADE for approximately nine months leading up to the drafting of these regulations, and both parties had come to agreement of the tiered thresholds as outlined in the proposed draft regulation. Subsequently, HBADE's comment submitted to the DEC asked for further weakening of the proposed regulation by increasing the square footage thresholds, which would reduce the energy savings to be achieved by the new code. DEC's TRM notes that the U.S. Department of Energy (the proponent of the air leakage [3ACH] code change) has ensured the cost-effectiveness of the new building air leakage requirements for all building sizes through rigorous analysis. Therefore, although the Department has carefully considered this proposal, DEC will not be implementing the additional changes proposed by HBADE.

For the Secretary's review, and in order for the Secretary to gain a thorough understanding of this proposed promulgation, a copy of the above-referenced proposed new regulation is attached hereto as Appendix "A", and the same is expressly incorporated into this Hearing Officer's Report. Additionally, as noted previously, the Division of Energy & Climate's

Technical Response Memorandum, which provides the Department's thorough responses to the public comment received in this matter, is attached hereto as Appendix "B", and the same is expressly incorporated into this Hearing Officer's Report as well. It should also be noted that all proper notification and noticing requirements concerning this proposed promulgation were met by the Department.

### **III. RECOMMENDED FINDINGS AND CONCLUSIONS:**

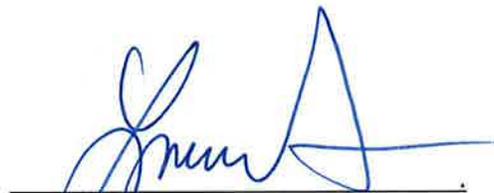
Based on the record developed, I find and conclude that the Department has provided appropriate reasoning regarding the need for the proposed new regulation to adopt the most recent and/or highest available version of the International Energy Conservation Code and the latest ASHRAE/IESNA energy standard as required by 16 *Del.C.* §7602, as well as 29 *Del.C.* §8058, to wit: 7 DE Admin. Code 103: State Energy Conservation Code. Accordingly, I recommend promulgation of the proposed new regulation in the customary manner provided by law.

Further, I recommend the Secretary adopt the following findings and conclusions:

1. Proper notice of the hearing was provided as required by law.
2. The Department has jurisdiction under its statutory authority to make a determination in this proceeding;
3. The Department provided adequate public notice of all proceedings in a manner required by the law and regulations;
4. The Department held its public hearing in a manner required by the law and regulations;

5. Promulgation of the proposed new regulation will enable Delaware to adopt the most recent and/or highest available version of the International Energy Conservation Code (“IECC”) and the latest ASHRAE/IESNA energy standard, as required by Delaware’s Energy Conservation Code Act (16 *Del.C.* §7602);
6. The recommended new regulation should be adopted as a final regulation because Delaware will be enabled to (1) adopt the 2012 IECC and 2010 ASHRAE standards with amendments; (2) formally set forth procedures for certification of compliance with these codes and standards to be utilized by respective local governments; and lastly, because (3) the proposed regulation is well supported by documents in the record;
7. The Department has reviewed this proposed regulation in the light of the Regulatory Flexibility Act, and believes the same to be lawful, feasible and desirable, and that the recommendations as proposed should be applicable to all Delaware citizens equally;
8. The Department’s aforementioned proposed new regulation, as published in the December 1, 2013 *Delaware Register of Regulations* and as set forth in Appendix “A” hereto, is adequately supported, is not arbitrary or capricious, and is consistent with the applicable laws and regulations. Consequently, it should be approved as a final regulation, which shall go into effect ten days after its publication in the next available issue of the *Delaware Register of Regulations*; and

9. The Department shall submit the proposed new regulation as a final new regulation to the *Delaware Register of Regulations* for publication in its next available issue, and shall provide such other notice as the law and regulations require, and as the Department determines is appropriate.



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LISA A. VEST  
Public Hearing Officer



# **APPENDIX “A”**



## 100 Office of the Secretary

### 103 Regulations for State Energy Conservation Code

#### 1.0 Purpose

1.1 The purpose of these regulations is to provide the Department of Natural Resources and Environmental Control's determination of the most recent and/or highest available version of the International Energy Conservation Code and the latest ASHRAE/IESNA standard. The goal of establishing these regulations is to provide a statewide building energy conservation code.

1.2 These regulations provide rules of practice and procedures for certification of compliance with these codes and standards to be utilized by the respective local governments.

#### 2.0 Statutory Authority

2.1 Delaware Code Title 16 Section 7602 provides the authority for adopting Delaware Energy Conservation Code. These regulations are promulgated under the authority of 16 Del. C. § 7602.

#### 3.0 Definitions

3.1 For purposes of these regulations, the following words and phrases shall have the meanings set forth below.

3.1.1 "**Department**" means the Department of Natural Resources and Environmental Control, the Division of Energy and Climate or the Delaware Energy Office.

3.1.2 "**IECC**" means the International Energy Conservation Code published by the International Code Council, Inc.

3.1.3 "**ASHRAE**" means the ANSI/ASHRAE/IES Standard 90.1: Energy Standard for Buildings except Low-Rise Residential Buildings published by the American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc.

3.1.4 "**DET verifier**" means a certified Duct and Envelope Tightness verifier. A certified DET verifier shall be a certified Home Energy Rating Systems (HERS) rater or field inspector, or be a certified Home Performance with ENERGY STAR contractor, or be a Building Performance Institute (BPI) Heating Professional to perform duct tightness testing or a BPI Building Analyst or Envelope Professional to perform building tightness testing, or successfully complete a course that is approved by the Department of Natural Resources and Environmental Control.

#### 4.0 Incorporation by Reference

4.1 The 2012 International Energy Conservation Code (IECC), published by the International Code Council, Inc., is hereby adopted and incorporated by reference with revisions as the Delaware Residential Building Energy Code and is an enforceable part of the Delaware Building Codes. The revisions to the 2012 IECC code are stated in Section 5 of these regulations.

4.2 The American Society of Heating, Refrigerating and Air-Conditioning Engineers Standards (ASHRAE) 90.1-2010: Energy Standard for Buildings except Low-Rise Residential Buildings and Commercial Provisions of the 2012 International Energy Conservation Code are hereby adopted and incorporated by reference in their entirety as the Delaware Commercial Building Energy Code and is an enforceable part of the Delaware Building Codes.

## 5.0 Revisions to the 2012 IECC

5.1 The following additions, insertions, deletions, and other changes are hereby made to the 2012 International Energy Conservation Code.

5.1.1 R403.2.2 amend to add: Supply duct tightness shall be verified by either of the following:

1. Post-construction test: Total leakage less than or equal to 6 cfm (169.9/min) per square feet (9.29 m<sup>2</sup>) of conditioned floor area when tested at the pressure differential of 0.1 inches w.g. (25 Pa)....
2. Rough-in test: Total leakage less than or equal to 6 cfm (169.9/min) per square feet (9.29 m<sup>2</sup>) of conditioned floor area when tested at the pressure differential of 0.1 inches w.g. (25 Pa) (*remainder unchanged – If the air handler is not installed.... ≤ 4 cfm...*)

5.1.2 R403.4.2: amend *list* to:

1. Piping larger than 3/4 inch nominal diameter.
2. Piping serving more than one dwelling unit.
3. ~~Piping from the water heater to kitchen outlets.~~
4. Piping located outside the conditioned space.
5. Piping from the water heater to a distribution manifold.
6. Piping located under a floor slab.
7. Buried piping.
8. Supply and return piping in recirculation systems ~~other than demand recirculation systems.~~
9. ~~Piping with run lengths greater than the maximum run lengths for the nominal pipe diameter given in Table R403.4.2.~~

~~All remaining piping shall be insulated to at least R-3 or meet the run length requirements of Table R403.4.2. Delete Table R403.4.2 without substitution.~~

5.1.3 R402.4.1.2:

**Exception:** A building or dwelling unit with 2,000 ft<sup>2</sup> or less of conditioned floor area (CFA) may satisfy R402.4.1.2 if it:

- 1) is tested to have an air leakage rate no greater than:  
5 ACH-50 for homes with < 1,500 ft<sup>2</sup> of CFA, or  
4 ACH-50 for homes with 1,500 – 2,000 ft<sup>2</sup> of CFA.)

5.1.4 R403.2.3 Building framing cavities shall not be used as ducts or plenums.

**Exception:** Returns run exclusively through conditioned space.

- a. 5.1.5 R403.5 The building shall be provided with mechanical ventilation that meets the requirements of the 2012 International Residential Code (IRC) or the International Mechanical Code (IMC), as applicable, or with other approved means of ventilation. Outdoor air intakes shall have automatic or gravity dampers that close when the ventilation system is not operating. Required ventilation rates shall also include adequate provisions for fuel-fired appliance, stove and fireplace makeup air supply; kitchen, bath, clothes dryer, and central vacuum exhausts; and other makeup air system supplies and/or exhausts as required in either the IRC or IMC.  
*(remainder of section unchanged)*

## **6.0 Implementation and Enforcement**

6.1 All buildings must meet all requirements of the applicable referenced code six months after date of promulgation.

6.2 All projects may utilize the new applicable reference codes at any time after the date of promulgation, provided such choice is stated on the construction documents.

## **7.0 Certified duct and envelope tightness (DET) verifier.**

7.1 Testing for duct and building envelope tightness shall be conducted by a certified DET verifier.



## **APPENDIX “B”**





STATE OF DELAWARE  
**DIVISION OF ENERGY & CLIMATE**  
1203 COLLEGE PARK DRIVE, SUITE 101  
DOVER, DELAWARE 19904

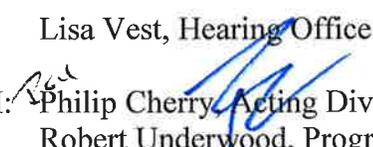


Office of Secretary  
Collin P. O'Mara

Phone: (302) 735-3480  
Fax: (302) 739-1840

**MEMORANDUM**

TO: Lisa Vest, Hearing Office

THROUGH:  Philip Cherry, Acting Division Director, Division of Energy and Climate  
Robert Underwood, Program Administrator, Division of Energy and Climate

FROM: Crystal Nagyiski, Program Manager, Division of Energy and Climate

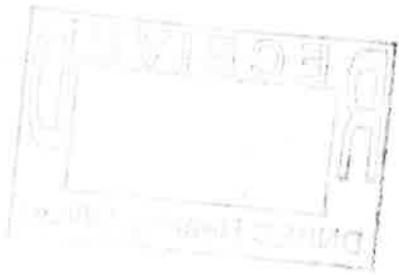
DATE: February 14, 2014

SUBJECT: Department's Response to Comments received on the proposed Regulation 103 for State Energy Conservation Code

You presided over a public hearing on Monday, January 6, 2014 beginning at 6:00 PM at DNREC R&R Auditorium, 89 Kings Hwy, Dover DE 19901. The subject of that public hearing was the proposed Regulation 103 for State Energy Conservation Code. The Department received comments from the following:

Date Received	Name	Organization
12/16/2013	Marc St. Jean	Delaware Building Officials Association (DBOA)
12/31/2013	Mike Moore	Newport Ventures (NV)
1/2/2014	Eric Lacey	Responsible Energy Codes Alliance (RECA)
1/6/2014	Howard Fortunato	Homebuilders Association of Delaware (HBADE)
1/6/2014	Kevin Rose	Northeast Energy Efficiency Partnerships (NEEP)
1/6/2014	Maureen Guttman	Building Codes Assistance Project (BCAP)
1/13/2014	Ed Minch	Energy Services Group (ESG)

This memorandum provides a summary of the comments received and the Division of Energy and Climate's (DE&C) response. Each comment received is included verbatim as an attachment.



## **I. Comments Received in Support of 103 Regulation for State Energy Conservation Code**

### **Comment 1**

The Department received 3 comments in support of the proposed regulation from Northeast Energy Efficiency Partnerships, Responsible Energy Codes Alliance and the Building Codes Assistance Project. In summary, the comments received applauded Delaware's efforts to create a better energy future for its citizens by adopting the 2012 International Energy Conservation Code (IECC) and ASHRAE 90.1-2010 Standard as the State Energy Conservation Code.

#### **Department Response**

The DE&C appreciates the letters of support, and recommends that the Department finalize the regulation as proposed.

## **II. Suggested Modifications to the proposed regulation.**

### **Comment 2**

Two commenters suggested that the definition of "DET Verifier" be further modified to specify which Building Performance Institute (BPI) certification is authorized to verify blower door tests, duct blaster tests, and which can do both. (DBOA & ESG)

#### **Department Response**

The Department agrees that the definition of "DET Verifier" should be modified to specify certain BPI certifications that are authorized to perform such testing. The proposed regulation will be modified before promulgation.

### **Comment 3**

One commenter suggested that the requirement for a Home Energy Rating System (HERS) rating score in section 5.1.3 be removed. (HBADE)

#### **Department Response**

The Department agrees with the removal of the HERS rating score requirement and had removed it from the proposed regulation prior to the public hearing.

### **Comment 4**

One commenter suggested changing Section 5.1.3 to adjust the square footage thresholds to the following (HBADE):

- a. 5ACH-50 for homes with less than 1,500 square feet of conditioned floor area.
- b. 4ACH-50 for homes from 1,500-2,500 square feet of conditioned floor area.
- c. 3ACH-50 for homes 2,500 square feet of conditioned floor area or larger.



**Department Response**

The Department has been working with the HBADE for approximately nine months leading up to the drafting of these regulations and both parties came to agreement of the tiered thresholds that are outlined in the draft regulation. During the public comment period, the HBADE asked for further weakening of the regulation by increasing the square footage thresholds which would reduce the energy savings to be achieved by the new code. The Department of Energy (DOE), the proponent of the air leakage (3ACH) code change, ensured the cost-effectiveness of the new building air leakage requirements for all building sizes through rigorous analysis. The Department has carefully considered this proposal, with technical input and expertise provided by NEEP and DOE, and opposes this new proposed change.

**Comment 5**

One commenter suggested adopting Section M1507 of the 2012 International Residential Code (IRC) as part of the State Energy Conservation Code to clearly set prescriptive requirements for specification of mechanical ventilation systems for dwellings that are compliant with the latest industry standards for acceptable indoor air quality, are easily applied by the builder/designer/contractor, and are easily enforced by the code official. (NV)

**Department Response**

The Department agrees with the suggestion to adopt Section M1507 of the 2012 IRC into the State Energy Conservation Code. The proposed regulation will be modified before promulgation.

Attachments (7)

