

September 24, 2024

Kevin Duerr-Clark
Assistant Director for Code Development
Division of Building Standards & Codes
NYS Dept. of State
99 Washington Ave
Albany, NY 12231-0001

Dear Kevin Duerr-Clark and NYS Building Code Council Members,

The undersigned organizations and elected officials support the following electrification and energy efficiency provisions being included in the 2024 Draft Building Code released at the July 26, 2024 council meeting and included in the Notice of Rule Development issued on July 25, 2024:

- Code language that complies with the requirements of the All-Electric Building Act by banning fossil-fuel combustion equipment from newly constructed low-rise buildings after December 31, 2025 and for all newly constructed buildings after December 31, 2028;
- Limitations on heat pumps having supplementary (back-up) heating systems to prevent the back-up system from being used when the heat pump can meet the heating load;
- Restrictions on the total installed heating capacity of electric-resistance space heating;
- Requirement for Demand Responsive Water Heating controls;
- Requirement for a minimum of on-site renewable energy generation systems;
- Requirement for Energy Recovery Ventilation for certain buildings;
- Increased lighting efficiency related to the amount of lumens per watt;
- Requirements for interior lighting to be controlled with either a manual dimmer or automatic shut-off controls;
- Limitations on exterior lighting power consumption and requirements for automatic shut-off during daylight;
- Requirements for the mitigation of energy losses through the building thermal envelope;
- Requirements for additional information to be contained in the compliance certificate including amount of Renewable Energy Generation Sources, Energy Rating Index Score and the location of Solar-Ready zones;
- More restrictive building thermal envelope requirements;
- Separate electric metering requirements for low-rise multi-family buildings;
- Restrictions on gas fireplace and gas lighting equipment, and
- Alignment with Federal standards requiring increased minimum efficiency requirements for gas-fired water heaters, hot-water boilers, air-conditioning, and refrigeration equipment.

Thank you for your consideration.

Sincerely,

350Brooklyn, Delia Kulukundis, Organizer
Albany UU Green Sanctuary Team, Chuck Manning, Chair Green Sanctuary Committee
All Our Energy, George Povall, Executive Director
Alliance for Clean Energy New York, Jed Prickett, Clean Energy Analyst
Alliance for a Green Economy, Avni Pravin, Deputy Director
American Council for an Energy-Efficiency Economy, Mark Kresowik, Senior Policy Director
Assemblymember Al Stirpe, District 127
Assemblymember Dr. Anna Kelles, District 125
Assemblymember Emily Gallagher, District 50
Assemblymember Linda B. Rosenthal, District 67
Assemblymember Phara Souffrant Forrest, District 57
Assemblymember Robert Carroll, District 44
Assemblymember Sarahana Shrestha, District 103
Assemblymember Steve Otis, District 91
Assemblymember Yudelka Tapia, District 86
Assemblymember Zohran Mamdani, District 36
Association for Energy Affordability, Betta Broad, Director of Advocacy & Organizing
Aztech Geothermal, LLC, John Ciovacco, President
Beacon, NY, Thomas Wright, Conservation Advisory Committee Member
Capital Region Interfaith Creation Care Coalition, Barbara Spink, Co-Chair
Citizens Climate Lobby, Sean Dague, NY State Coordinator
Dandelion Geothermal, Heather Deese, Sr. Director Policy & Regulatory Affairs
Environmental Advocates, Vanessa Fajans-Turner, Executive Director
Food & Water Watch, Eric Weltman, Senior Organizer
For the Many, Jonathan Bix, Executive Director
Frack Action, Renee Vogelsang, New York Director
Green Building Specialists, Marcy Cleveland, Owner & Operator
Green Team LI, Jay Best, President
Halco Energy, Hal Smith, CEO
Long Island Progressive Coalition, Ryan Madden, Climate & Energy Campaigns Director
LaMorte Electric, Brian LaMorte, CEO
Network for a Sustainable Tomorrow, Adam Flint, Director of Clean Energy Programs
New York City Environmental Justice Alliance, Conor Bambrick, Senior Climate Advisor
New York Communities for Change, Santosh Nandabalan, Senior Climate Campaigner
New Yorkers for Clean Power, Anshul Gupta, Policy & Research Director
New Yorkers for Cool Refrigerant Management, Michael Helme, Lead Volunteer
Northeast Energy Efficiency and Electrification Council, Steve Cowell, Executive Director
NY-GEO, Christine Hoffer, Executive Director
NYS Senator Jessica Ramos, District 13
NYS Senator Liz Krueger, District 28
NYS Senator Pete Harckham, District 40
NYS Senator Robert Jackson, District 31
PSD Consulting, Greg Thomas, CSTO and Founder

RAC-NY, Ben Elkind, Lead Organizer
Rewiring America, Michael Hernandez, New York Policy Director
SAFE Cities at Stand.earth, Anne Pernick, Senior Advisor
Scenic Hudson, Stephan Ballentine, Director of Environmental Advocacy and Public Policy
SEALED, Savannah Bertrand, Senior Policy Manager
Sierra Club Niagara Group, Janet Lenicheck, Chairperson
Tech for Local Law 97, Tom O'Keefe, Director
The Climate Reality Project NYC Chapter, Paul Kiesler, Co-Chair
Tompkins County Climate Protection Initiative, Peter Bardaglio, Coordinator
Treeage, Shiv Soin, Co-Executive Director
Urban Green Council, Danielle Manley, Policy Manager
WNY Interfaith Climate Justice Community, Roger Cook, Steering Committee Member