

September 29, 2015

The Honorable Fred Upton
Chairman
Committee on Energy & Commerce
U.S. House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy & Commerce
U.S. House of Representatives

Dear Chairman Upton and Ranking Member Pallone,

Our organizations represent a broad sector of the residential and commercial construction and real estate industry, including builders, developers, Realtors®, property managers, contractors and product manufacturers. We are writing to you to strongly urge you vote FOR the *North American Energy Security and Infrastructure Act of 2015* that will include language known as “Blackburn/Schrader,” that encourages meaningful energy savings for buildings by ensuring that new model building energy codes are achievable, technology-neutral and cost-effective.

Model building energy codes are used across the country to establish baseline standards for building energy efficiency. While the Department of Energy (DOE) does not write these codes, it can be an effective participant in their development by providing technical assistance to analyze energy savings. Over the last few years, however, DOE has increasingly advocated for a prescriptive approach that favors certain products and technologies and pursued aggressive and expensive requirements. This has led to a code that is inflexible, very costly and unusable for many states.

The “Blackburn/Schrader” language seeks to improve the process by which these codes are developed by:

- *Increasing Transparency:* Requires DOE to publish energy savings targets, code change proposals and all supporting analysis and methodology in the Federal Register and accept public comment;
- *Ensuring Product and Technology-Neutrality:* Strengthens DOE’s role as a neutral, technical advisor, but prohibits DOE from advocating for certain products/technologies; and
- *Promoting Cost-Effectiveness:* Requires any code or proposal supported by DOE to have a simple payback (increased compliance costs should be paid back through utility savings) of 10 years or less.

We strongly support these reforms and encourage you to support the *North American Energy Security and Infrastructure Act of 2015*. Consumers deserve a reasonable return on their investment when it comes to required energy efficiency improvements. Failure to consider the true costs of energy-use reductions that would establish a reasonable payback period for these investments will exacerbate the shortage of affordable housing as well as increase compliance costs for commercial landlords and many of their tenants. The high cost of meeting the baseline standards may also serve as a disincentive for “green building” practices that encourage – and often require – investments above the baseline code.

Thank you for your consideration and we look forward to working with you and other Members of the Committee to advance this important legislation.

Sincerely,

American Gas Association

American Public Gas Association

American Wood Council (list of member companies attached)

APA – the Engineered Wood Association

Building Owners and Managers (BOMA) International

Coalition for Fair Energy Codes

Hearth, Patio & Barbecue Association

International Council of Shopping Centers

Leading Builders of America

NAIOP, the Commercial Real Estate Development Association

National Apartment Association

National Association of Home Builders

National Association of REALTORS®

National Electrical Contractors Association

National Lumber and Building Material Dealers Association

National Multifamily Housing Council

The Real Estate Roundtable

Window and Door Manufacturers Association

Cc: Members of the House Committee on Energy & Commerce

Supporting Members



AMERICAN WOOD COUNCIL

June 2015

- Almond Bros. Lumber
- Anthony Forest Products
- Boise Cascade
- Canadian Wood Council
- Canfor USA/New South
- Charles Ingram Lumber
- Collum's Lumber
- Columbia Vista
- Deltic Timber
- Georgia-Pacific
- Gilman Building Products
- Green Bay Packaging
- Hampton Resources
- Harrigan Lumber
- High Cascade/WKO
- Hood Industries
- Hull-Oakes Lumber
- Humboldt Redwood Company
- H.W. Culp Lumber
- Idaho Forest Group
- Idaho Timber
- Interfor U.S. Inc.
- Interstate Resources
- Jordan Lumber & Supply Company
- Kapstone Paper & Packaging
- Lampe & Malphrus
- LP
- Masonite
- McShan Lumber
- Mendocino Redwood Company
- Mt. Hood Forest Products
- MWV
- Norbord
- Plum Creek
- Potlatch
- Rex/North Florida
- Roseburg Forest Products
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- Seneca Sawmill Company
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- Sierra Pacific
- Stimson Lumber
- Swift Lumber
- T.R. Miller Mill Company
- Vaagen Brothers
- West Fraser
- Westervelt
- Weyerhaeuser

AMERICAN WOOD COUNCIL

The American Wood Council (AWC) is the voice of the North American wood products manufacturing industry, providing information on wood design, green building, and environmental regulations and advocating for balanced government policies that affect wood products.

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