



Shaping Tomorrow's
Built Environment Today

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Jeff H. Littleton

Executive Vice President

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July 17, 2023

Mr. Michael Freedberg
Senior Advisor for High Performance Building
Office of Environment and Energy
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 7282
Washington, DC 20410

Ms. Meghan Walsh
Senior Architect
Rural Housing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250

RE: Adoption of Energy Efficiency Standards for New Construction of HUD- and USDA-Financed
Housing: Preliminary Determination and Solicitation of Comment (Docket ID No. FR-6271-N-01)

Dear Mr. Freedberg and Ms. Walsh:

The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) applauds the efforts of the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Agriculture (USDA) to update the reference building standards used across a broad range of programs. Specifically, there will be significant recognized consumer savings by updating from ASHRAE Standard 90.1-2007 to ASHRAE Standard-2019. To maximize the impact of building energy efficiency, building codes must improve and adapt over time to provide necessary guidance for building owners. Using an outdated building standard can significantly affect the energy efficiency of a building; ASHRAE Standard 90.1-2019 is 38% more effective than 90.1-2004, and 5% more effective than the previous version, 90.1-2016.

ASHRAE would also like to recommend HUD and USDA consider offering ASHRAE Standard 90.2-2018 as an alternative to IECC 2021. The most recent edition of ASHRAE's residential energy standard, ANSI/ASHRAE/IES Standard 90.2-2018, *Energy-Efficiency Design of Low-Rise Residential Buildings*, delivers residential building energy performance that is about 50% less energy consumptive than the energy efficiency defined by the 2006 IECC and 20% more efficient than the 2021 IECC. Even while delivering greater energy efficiency than the 2021 IECC, ASHRAE 90.2-2018 provides more flexibility to users to

satisfy local conditions and costs. ASHRAE Standard 90.2 is performance-based with a compliance path based on an Energy Rating Index, while the IECC has a prescriptive path as its base compliance pathway. If a prescriptive path is desired by a specific locality to enable enforcement, ASHRAE 90.2-2018 provides an informative appendix with the methodology to develop a customized prescriptive pathway.

ASHRAE, founded in 1894, is a technical society advancing human well-being through sustainable technology for the built environment. The Society and its more than 53,000 individual members – comprising engineers, academics and other professionals in the buildings industry – focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability within the industry. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

Please do not hesitate to contact me for more information, or have your staff contact GovAffairs@ashrae.org. Thank you again for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Littleton', followed by a horizontal line.

Jeff Littleton
ASHRAE Executive Vice President