



May 31, 2016

Richard S. (Dick) Browdy
Chairman, Florida Building Commission
6944 St. Augustine Road, Suite D
Jacksonville, Florida 32217

Chairman Browdy:

The purpose of this letter is to register the National Insulation Contractors' Exchange (NICE) opposition to allowing unlimited on-site renewable energy generation to substitute for cost-effective, long lasting energy conservation measures in both the 5th and 6th edition of the Florida Residential Building Energy Code. NICE is a national organization representing independent insulation contracting companies. Many of our members are Florida companies and NICE is headquartered in Fernandina Beach.

NICE members are proud of the fact that our installed insulation materials provide homeowners with both comfort and cost-effective energy savings for the life of their homes. Florida has a strong tradition of recognizing the value of energy conservation by promoting building energy code updates that are more stringent than the previous code. This progress is threatened if the Florida Building Commission adopts the Energy Rating Index (ERI) compliance path and allows on-site energy generation to offset energy conservation measures for purposes of code compliance. It is our understanding that if such offsets are permitted, homes are unlikely to be built any better than the 2009 model energy code, because the ERI sets the 2009 model energy code as the backstop for thermal envelope efficiency.

Solar leases accounted for more than 70 percent of home solar sales in 2014. That means a solar panel is likely to be an impermanent part of a new Florida home – providing a benefit of an uncertain quantity for an uncertain duration. In contrast, building energy conservation measures like sealing and insulation provide demonstrated energy savings for the life of the building.

Allowing for the construction of a less efficient home simply because it comes with solar panels should not be the goal of the updated Florida Building Energy Code. Therefore, NICE urges the Commission to prohibit or tightly limit the amount of credit allowed for on-site generation for building energy code compliance.

Sincerely,

Dennis M. Barrineau
President
National Insulation Contractors' Exchange, LLC

