



Shaping Tomorrow's Global Built Environment Today

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Bill McQuade
ASHRAE Society President, 2025-2026

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August 6, 2025

The Honorable Scott Turner
Secretary
Department of Housing and Urban Development
451 7th Street SW,
Washington, DC 20410

The Honorable Brooke Collins
Secretary
Department of Agriculture
1400 Independence Avenue SW,
Washington, DC 20250
Dear Secretary Turner and Secretary Collins:

Thank you for the opportunity to provide input on the July 7, 2025, notice for comment issued by HUD and USDA on the Adoption of Energy Efficiency Standards for New Construction of HUD- and USDA-Financed Housing.

ASHRAE, founded in 1894, is a professional and technical society of more than 54,000 members who focus on building systems, energy efficiency, IAQ, refrigeration, and resiliency within the built environment. Through research, standards development, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

On April 26, 2024, HUD and USDA finalized minimum energy efficiency standards for new construction of HUD- and USDA-financed housing, adopting the 2021 International Energy Conservation Code (IECC) for single-family and low-rise multifamily buildings and ASHRAE 90.1-2019 for mid-to high-rise multifamily buildings. These updates reflect over a decade of technological improvements as HUD and USDA were using the outdated 2009 IECC and ASHRAE 90.1-2007.

ANSI/ASHRAE/IES Standard 90.1, *Energy Standard for Buildings Except Low-Rise Residential Buildings* ("ASHRAE Standard 90.1") is the benchmark for commercial building energy codes in the United States and has been a key basis for codes and standards around the world for more than 45 years. ASHRAE Standard 90.1 must be cost-effective and is established through a process with broad input and buy-in from building owners, design professionals, utilities, manufacturers, representatives from the Department of Energy (DOE), and other materially affected and interested parties. The process is open for public review, allowing all interested parties to provide input into development of the standard and

reach consensus, ensuring publication of a document that has been rigorously and openly examined, questioned and defended.

While some have argued that building to updated energy standards will increase costs, the energy cost savings far outweigh the incremental increase in first costs. For housing built to the 2019 version of ASHRAE Standard 90.1 (compared to the 2007 edition), the incremental cost increase is estimated at only \$18 per unit, while the energy cost savings for the first year are \$224 per unit. This amounts to a simple payback of about one month! **Building to updated energy standards actually makes housing more affordable.** I'd also note that 15 states have already adopted ASHRAE 90.1-2019 into their state building code, and housing costs vary across all the states.

Additionally, buildings constructed to a modern energy code make homes more resilient to extreme weather events, keeping occupants safe for longer when the power goes out, and because buildings constructed to a modern energy code reduce demand from the grid, they also keep the grid online for longer when it's under stress during inclement weather. Reducing demand on the grid allows more energy to be used for other purposes instead of powering a home. The U.S. Energy Information Administration recently reported that electricity prices have risen faster than inflation since 2022 and may rise much more in the coming years due to projected demand increases. That is why it is critical to build homes efficiently now to insulate consumers from those costs. This energy reduction is also especially important in light of the rising electricity demand from artificial intelligence and new data centers. It is less costly to decrease demand than to increase grid capacity.

With these facts in hand, we hope you will move forward with implementing the April 2024 final determination. We can also provide your agencies with any technical expertise and resources on ASHRAE Standard 90.1 as you continue to gather more information. If you have questions or need additional information, please do not hesitate to contact me or have your staff contact GovAffairs@ashrae.org.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill McQuade", with a stylized flourish at the end.

Bill McQuade
ASHRAE Society President, 2025-2026