



Shaping Tomorrow's Global Built Environment Today

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April 18, 2025

The Honorable French Hill
Chairman
Committee on Financial Services
U.S. House of Representatives
2129 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Tim Scott
Chairman
Committee on Banking, Housing, and Urban Affairs
U.S. Senate
534 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Maxine Waters
Ranking Member
Committee on Financial Services
U.S. House of Representatives
4340 O'Neill House Building Washington
Washington, D.C. 20515

The Honorable Elizabeth Warren
Ranking Member
Committee on Banking, Housing, and Urban Affairs
U.S. Senate
534 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Chairman Hill, Chairman Scott, Ranking Member Waters and Ranking Member Warren:

On behalf of ASHRAE, I would like to express our opposition to H.R.75, the “Helping Owners with Unaffordable Shoddy Edicts (HOUSE) Act of 2025,” which would require the Secretary of Housing and Urban Development (HUD) and the Secretary of Agriculture (USDA) to withdraw a final determination relating to energy efficiency standards for housing. Specifically, the legislation would revert the energy efficiency requirements to standards over a decade older, making homes constructed by HUD and USDA less affordable to operate.

ASHRAE, founded in 1894, is a professional and technical society of more than 55,000 professional members who focus on building systems, energy efficiency, indoor air quality, refrigeration and resiliency within the HVACR industry. Through our Society's research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today. 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.

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.

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.**

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. This energy reduction is 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.

The HOUSE Act would withdraw this rulemaking to update the energy efficiency requirements, subsequently increasing the energy bills for working families.

With these facts in hand, we hope you will agree that this legislation should not move forward. 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 blue ink that reads "M. Dennis Knight". The signature is written in a cursive, flowing style. It is positioned above a faint, rectangular, light blue watermark or background element.

M. Dennis Knight, P.E.
ASHRAE Society President, 2024-2025