

From: noreply@formstack.com
To: [Fire Prevention and Building and Safety Commission](#)
Subject: Code Comments, Proposals and Advice
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Formstack Submission For: **4202**

Submitted at 05/21/21 4:16 PM

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Indiana Code You Are Commenting On:	2014 Indiana Building Code (675 IAC 13-2.6) 2020 Indiana Residential Code (675 IAC 14-4.4) 2010 Indiana Energy Conservation Code (675 IAC 19-4)

May 21, 2021

Indiana Fire Prevention and Building Safety
Commission
Exploratory Committee for Code Updates
302 W. Washington Street, Room E208
Indianapolis, IN 46204

Re: Public Comments on the Commission's Current
Rules

Dear Chairman Popich and Members of the

Committee,

Thank you for opportunity to comment on Indiana's review of current statewide codes and recommending proposals for the next statewide codes. The Midwest Energy Efficiency Alliance (MEEA) is a member-based non-profit organization that promotes cost-effective energy efficiency policies in the Midwest. MEEA has previously worked in Indiana on energy codes and provided technical assistance to the Indiana Department of Homeland Security in previous energy code adoption cycles.

According to Clean Jobs Midwest 2020 report, the energy efficiency sector supported more than 48,166 jobs in Indiana. The 2020 pandemic shocked the nation's labor market and Indiana saw a 13.5% decline in energy efficiency employment since December 2019. This caused great disruption within the building sector substantially impacting the industry supply chain, including HVAC equipment, windows, insulation, lighting or manufacturing. The energy efficiency workforce has great potential to meet Indiana's economic recovery, but supportive policy solutions are critical to creating conditions to revive this vital sector. Indiana has an opportunity to build on this investment, improve the livability and resiliency of new homes and buildings, reduce energy consumption and continue to spur local construction and manufacturing jobs.

MEEA supports adopting new building energy codes for commercial and residential buildings in the state. Updating these codes would not add additional regulatory burden to construction professionals in the state, but instead modifies existing regulations to in order to drive improvements in building energy efficiency. The adoption of new codes is necessary for Indiana keep up with changes in construction best practices throughout the region, reduce the operating costs of homes and buildings, and improve public health and wellness.

In order to achieve these wide-ranging benefits cost-effectively, we specifically recommend that Indiana adopt, or appropriately reference, the energy conservation requirements found in the 2021 International Energy Conservation Code (IECC) for residential and commercial buildings in its entirety as the statewide minimum building energy codes. Adopting the latest model energy codes without

amendments makes sense for Indiana, as they provide wide-ranging benefits in building energy efficiency, energy cost savings, resilience, and public health. The adoption of the 2021 IECC also ensures that Indiana is allowing the installation of the latest technological advances and construction best practices in their buildings.

Residential Code

The improvements between the 2021 IECC and Indiana's current energy efficiency provisions (2018 IRC with amendments for residential buildings, and the 2009 IECC for commercial buildings) are well within the capabilities of construction professionals in the state. This latest edition of the model energy code has a revised format and provides builders with significant flexibility on how to comply with its provisions. The changes to the energy efficiency measures ensure that the long-lasting benefits of a more resilient building envelope will be provided to residential and commercial buildings constructed in Indiana for years to come.

Comment or Proposal:

While Indiana recently made an update to the energy provisions in the statewide residential code, it missed significant opportunities to improve energy efficiency, occupant comfort, and indoor air quality in residential buildings. The residential provisions in the 2021 IECC contain changes that would cost-effectively reduce energy waste while improving building performance and indoor environmental quality for owners and occupants of newly-built homes in Indiana. The improvements to the building envelope ensure that homes better maintain indoor temperatures, provide increased resilience, and more productive and comfortable living and working spaces. The different compliance pathways and additional efficiency options in the 2021 IECC provide builders with a means to cost-effectively construct a highly efficient home without major changes to their preferred construction practices. Updating the residential energy code is also one of the most cost-effective ways to reduce energy consumption, saving homeowners and occupants money on their utility bills for years to come.

Additionally, the adoption of the 2021 IECC for residential buildings would incorporate the benefits of building envelope testing for all newly constructed homes. Because of advances in construction practices, homes are often built to be very airtight, which offers

significant energy savings. However, without building envelope testing, builders do not have a means to understand the air tightness of the home, and therefore no way to ensure that appropriate levels of ventilation are provided. Lack of proper ventilation can have detrimental effects to the building and its occupants – improperly ventilated homes often have increased prevalence of moisture and mold, which can lead to negative air quality and health issues. Air sealing, envelope testing, and proper ventilation ensure that homes are equipped with appropriate amounts of fresh air from controlled sources. Indiana residents will breathe healthier indoor air and feel more comfortable in their homes and buildings by updating the unamended 2021 IECC.
Commercial Code

Updating Indiana’s commercial energy code to the 2021 IECC would result in nearly a 37.5% improvement in building energy efficiency. The state’s current energy efficiency requirements for commercial buildings are over a decade old. Adopting the 2021 IECC would improve Indiana’s built environment with current construction best practices, increased resilience, better indoor air quality, higher levels of occupant comfort and increase productivity and reduce costs in commercial buildings.

The adoption of the unamended 2021 IECC is a cost-effective way to improve building energy efficiency and reduce operating costs of buildings in Indiana. While there may be modest increases to the cost of construction associated with the improved building practices in the 2021 IECC, the numerous health and economic benefits to occupants and the community are undeniable, including reduced utility costs and long-term affordability to Indiana residents. Considering many new homes and buildings constructed today will be in active use for the next 50+ years, it is critical that the long-lasting affordability and livability measures be installed when it is most cost effective to do so – during initial construction. Updating the energy code assures those benefits are captured for current residents and future generations.

The Exploratory Committee has a unique opportunity to review and update all building codes for the state of Indiana. Updating all statewide building codes at the same time sets consistent expectations that builders and code officials can rely on. Postponing the adoption of

the residential energy code would result in these provisions to be out of sync with the other adopted building codes. Building codes are inextricably linked, with codes in the same model year often referencing key sections from one code to another. Failure to adopt the full suite of codes could cause confusion during implementation since older residential and commercial energy provisions are not designed to communicate with the 2021 codes.

The adoption of the 2021 IECC is a cost-effective way to increase the level of energy efficiency in residential and commercial buildings while keeping up with competing states throughout the region. We urge the council to support the adoption of the unamended 2021 IECC for residential and commercial buildings in Indiana. Doing so will reduce the energy use and cost for residents, create more comfortable and healthier indoor environments, and aid the economic recovery of the energy efficiency workforce. If you have any additional questions, please contact MEEA's Building Program Manager, Nicole Westfall at nwestfall@mwalliance.org.

Thank you for your time and consideration.

Sincerely,

Stacey Paradis
Executive Director

File: [View File](#)



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¹ For more information, visit <https://www.cleanjobsmidwest.com/state/indiana>

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Executive Director

² Based on analysis by the U.S. Department of Energy. See <https://www.energycodes.gov/development/determinations> for more information.