

GEW65-14

605.1.1

Proponent: Larry Williams, Steel Framing Association, representing Steel Framing Industry Association (Williams@steelframingassociation.org)

Revise as follows:

605.1.1 Insulation and fenestration criteria. In climate zones 1, 2, 3, 4 and 5, the thermal resistance of the building thermal envelope shall be not less than ~~exceed~~ the requirements of Tables C402.1.2 and C402.3 of the International Energy Conservation Code ~~by not less than 10 percent.~~ Specifically, for purposes of compliance with this code, In climate zones 6, 7, and 8, each U-factor, C-factor, F-factor and SHGC in the specified Tables C402.1.2 and C402.3 of the *International Energy Conservation Code* shall be reduced by 10 percent to determine the prescriptive criteria for this code. In Sky Type 'C' locations specified in Section 808.4, the skylights shall not exceed 5 percent of the roof area.

Reason: This proposal will reduce the application of an arbitrary U-factor reduction across the board to all climate zones despite the benefits of further decreases in envelope requirements being insignificant in the warmer climate zones.

A 10% U-factor decrease is not the same as a 10% increase in performance. It is discriminatory against some building materials due to the different U factors in the base IECC code. This creates a different "green standard" for performance for some materials versus others. The 10% is more stringent for those materials with higher U-factors in the IECC. This unlevel playing field is mitigated somewhat by applying the 10% only to the colder climate zones where the potential energy savings, although still small, is not as insignificant as in the warmer climate zones.

Cost Impact: Will not increase the cost of construction.

Analysis: The International Energy Conservation Code tables C402.1.2 and C402.3 referenced in the text of this proposal are numbers for the 2012 Edition. Due to significant changes approved for the 2015 IECC, the table numbers for the 2015 Editions will be C402.1.4 and C402.4, respectively.

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