INTERNATIONAL CODE COUNCIL 2012-2014 CODE DEVELOPMENT CYCLE Group C (2014)

2014 PUBLIC COMMENT AGENDA DISCUSSION GUIDE

INTERNATIONAL GREEN CONSTRUCTION CODE

-General
-Energy/Water



October 1 – 4, 2014

GREATER FORT LAUDERDALE BROWARD COUNTY CONVENTION

CENTER

FORT LAUDERDALE, FLORIDA

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DISCUSSION GUIDE 2014 (GROUP C) ICC CODE DEVELOPMENT CYCLE PUBLIC COMMENT AGENDA DISCUSSION GUIDE

The purpose of this guide is to assist the efficient discussion of the individual agenda items by providing an overview of the committee actions, assembly actions (if any) and the submitted Public Comments. The agenda items are listed in the same order as the published Tentative Hearing Order on page xxxiv of the 2014 Public Comment Agenda document.

See page xxviii of the 2014 Public Comment Agenda document (Section 7.5 of CP#28-05). Section 7.5.8.5 requires that the Code Development Committee Action be the initial motion.

Whenever a motion under consideration is for Approval as Submitted or Approval as Modified, a subsequent motion and second for a modification published in the Public Comment Agenda may be made (see Section 6.4.3). Each subsequent motion for modification, if any, shall be individually discussed and voted before returning to the main motion. When the initial motion is for Disapproval, that motion must be voted upon before any other motions are entered. This is reflected in the column under "Allowable Subsequent Motions per Section 7.5.8.6 (CP#28).

Excerpts from CP #28:

- 7.5.8.5 Initial Motion: The code development committee action shall be the initial motion considered.
- **7.5.8.6 Motions for Modifications:** Whenever a motion under consideration is for Approval as Submitted or Approval as Modified, a subsequent motion and second for a modification published in the Public Comment Agenda may be made (see Section 6.4.4). Each subsequent motion for modification, if any, shall be individually discussed and voted before returning to the main motion. A two-thirds majority based on the number of votes cast by eligible voters shall be required for a successful motion on all modifications.
- **7.5.8.7 Voting:** After dispensing with all motions for modifications, if any, and upon completion of discussion on the main motion, the Moderator shall then ask for the vote on the main motion. The vote on the main motion shall be taken electronically with the vote recorded and each vote assigned to the eligible voting member. If the motion fails to receive the majority required in Section 7.6, the Moderator shall ask for a new motion.
- **7.5.8.8 Subsequent Motion:** If the initial motion is unsuccessful, a motion for either Approval as Submitted or Approval as Modified by one or more published modifications is in order. A motion for Disapproval is not in order. The vote on the main motion shall be taken electronically with the vote recorded and each vote assigned to the eligible voting member. If a successful vote is not achieved, Section 7.5.8.9 shall apply.
- **7.5.8.9 Failure to Achieve Majority Vote at the Public Comment Hearing.** In the event that a code change proposal does not receive any of the required majorities in Section 7.6, the results of the Public Comment Hearing for the code change proposal in question shall be Disapproval. The vote count that will be reported as the Public Comment Hearing result will be the vote count on the main motion in accordance with Section 7.5.8.7.
- **7.5.8.10 Public Comment Hearing Results:** The result and vote count on each code change proposal considered at the Public Comment Hearing shall be announced at the hearing. The results shall be posted and included in the Online Governmental Consensus Ballot (see Section 8.2).
- **7.6 Majorities for Final Action:** The required voting majority for code change proposals individually considered shall be based on the number of votes cast of eligible voters at the Public Comment Hearing shall be in accordance with the following table:

Committee Action	Desired Final Action	Desired Final Action					
	AS	AM/AMPC	D				
AS	Simple Majority	2/3 Majority	Simple Majority				
АМ	2/3 Majority	Simple Majority to sustain the Committee Action or; 2/3 Majority on each additional modification and 2/3 Majority on entire code change proposal for AMPC	Simple Majority				
D	2/3 Majority	2/3 Majority	Simple Majority				

GROUP C

PROPOSED	COMMITTEE	SUBSEQUENT		PUBLIC COMMENTS	FINAL
CHANGE	HEARING ACTION	MOTIONS PER SECTION 7.5.8.6 (CP# 28)	DESIRED ACTION	PUBLIC COMMENT NUMBER	ACTION
INTER	RNATIONAL	GREEN CO	ONSTRU	JCTION – GENERAL	
		CHAP ⁻	ΓER 1		
GG6-14	D	None	AMPC	1	
GG27-14	D	None	AS	1	
GG9-14	D	None	AS	1	
GG10-14	D	None	AMPC	1	
GG72-14	D	None	AS	1	
GG17-14	D	None	AMPC	1	
GG75-14	D	None	AS	1	
			AM	1 (Assembly Action), 2	
GG320-14	D	None	AMPC	3, 4, 5	
			D	6, 7	
GG18-14	D	None	AMPC	1	
GG19-14	D	None	AMPC	1	
0000 44	Б	None	AS	1 (Assembly Action), 2, 3	
GG26-14	D		D	4	
GG29-14	D	None	AMPC	1	
GG31-14	D	None	AS	1	
	•	CHAP	ΓER 3		
GG84-14	D	None	AS	1	
CC05 44	^ 0	4450	AMPC	1, 2	
GG85-14	AS	AMPC	D	3	
GG86-14	AS	None	D	1	
GG87-14	D	None	AS	1	
GG89-14	D	None	AS	1	
GG90-14	D	None	AS	1	
GG92-14	D	None	AS	1	
GG98-14	D	None	AMPC	1	
GG39-14	AM	AMPC	AMPC	1, 2	
GG88-14	D	None	AS	1	
GG95-14	D	None	AS	1, 2	

INTERNATIONAL GREEN CONSTRUCTION – GENERAL (continued)						
		CHAF	PTER 4			
GG102-14	D	None	AS	1		
GG102-14	U		AMPC	2		
GG103-14	D	None	AMPC	1		
GG104-14	D	None	AS	1		
GG104-14	U		D	2		
GG105-14	AS	AMPC	AMPC	1		
00103-14	AG	AWFC	D	2 (Assembly Action), 3		
GG106-14	D	None	AMPC	1		
GG107-14	D	None	AS	1		
GG108-14	D	None	AS	1		
GG109-14	D	None	AS	1		
	D		AMPC	2, 3		
GG113-14	D	None	AMPC	1		
GG114-14	D	None	AMPC	1		
GG116-14	D	None	AMPC	1		
GG120-14	D	None	AMPC	1		
GG121-14	D	None	AMPC	1		
GG122-14	D	None	AS	1		
GG123-14	D	None	AMPC	1		
GG126-14	D	None	AMPC	1		
GG129-14	D	None	AMPC	1		
GG131-14	D	None	AS	1		
GG54-14	AS	None	D	1		
GG56-14	AS	AMPC	AMPC	1		
GG133-14	D	None	AMPC	1,2		
GG134-14	D	None	AMPC	1		
GG58-14	D	None	AMPC	1		
GG136-14	D	None	AMPC	1, 2		
GG137-14	D	None	AMPC	1, 2		
GG138-14	D	None	AS	1		
GG141-14	D	None	AMPC	1		
GG143-14	D	None	AMPC	1		
GG145-14	D	None	AS	1		
GG147-14	AS	None	D	1		
GG144-14	AS	AMPC	AMPC	1, 2		
GG149-14	D	None	AMPC	1		
GG150-14	AS	AMPC	AMPC	1		
GG140-14	D	None	AMPC	1		
GG151-14	D	None	AS	1		

INTERNATION	ONAL GREI	EN CONST	RUCTION -	- GENERAL (conti	nued)
		CHAPTER 4	4 (continued)		
00450 44		None	AS	1	
GG152-14	D		AMPC	2	
00450 44		None	AS	1	
GG153-14	D		AMPC	2, 3	
00454.44		None	AS	1	
GG154-14	D		AMPC	2, 3	
CC155 14		None	AS	1	
GG155-14	D		AMPC	2, 3, 4	
0070.44		None	AS	1	
GG79-14	D		AMPC	2, 3	
GG156-14	D	None	AMPC	1	
GG159-14	D	None	AMPC	1	
			AM	1	
GG162-14	AM	None	D	2	
		None	AS	<u>2</u> 1	
GG163-14	D	None	D	2	
GG164-14	D	None	AMPC	<u>-</u> 1	
			AS	 1	
GG77-14	AS	AMPC	AMPC	2, 3	
00400 44	4.0	44400	AMPC	1, 2	
GG166-14	AS	AMPC	D	3	
		None	AMPC	1	
GG168-14	D		D	2	
		None	AMPC	 1	
GG169-14	D	None	D	2	
GG170-14	D	None	AMPC	1, 2, 3	
GG68-14	D	None	AMPC	1	
GG176-14	AS	AMPC	AMPC	1	
		<u> </u>	TER 5	·	
GG184-14	D	None	AMPC	1, 2	
GG185-14	D	None	AMPC	1, 2	
			AMPC	<u>'</u> 1	
GG187-14	AS	AMPC	D	2	1
GG188-14	D	None	AMPC	<u></u>	
GG189-14	D	None	AMPC	<u>.</u> 1	
GG191-14	D	None	AS	<u>·</u> 1	
GG200-14	D	None	AS	<u>.</u> 1	
GG60-14	D	None	AMPC	1, 2	
GG206-14	D	None	D	1	

INTERNATIO	DNAL GREI	EN CONST	RUCTIOI	N – GENERAL (contil	nued)
		CHAPTER :	5 (continued	<u>a)</u>	
GG208-14	D	None	AS	1	
GG209-14	D	None	AMPC	1	
GG210-14	D	None	AMPC	1	
GG197-14		None	AMPC	1	
GG197-14	D		D	2	
			AS	1	
GG194-14	AS	AMPC	AMPC	2	
			D	3, 4, 5, 6	
GG202-14	D	None	AMPC	1	
			AS	1	_
GG212-14	AS	AMPC	AMPC	2, 3, 4	
			D	5, 6, 7	
00400 44	-	None	AS	1, 2	
GG192-14	D		AMPC	3	
GG211-14	D	None	AMPC	1, 2	
GG214-14	AS	AMPC	AMPC	1, 2	
GG219-14	AS	None	D	1	
		AS AMPC AMP	AMPC	1, 2	
GG217-14	AS		D	3	
GG218-14	AS	None	D	1, 2	
		CHAP	TER 8	·	•
			AMPC	1	
GG226-14	AS	AMPC	D	2	
GG228-14	AS	AMPC	AMPC	1, 2	
GG234-14	D	None	AMPC	1	
GG235-14	D	None	AMPC	1	
GG236-14	D	None	AMPC	1	
GG249-14	AM	None	AS	1	
GG251-14	AS	AMPC	AMPC	1	
GG254-14	AS	AMPC	AMPC	1	
GG256-14	AS	AMPC	AMPC	1	
GG258-14	D	None	AS	1	
GG263-14	AS	None	D	1	
GG267-14	D	None	AMPC	•	
00207 14	ט		TER 9	1, 2, 3	
00074.44		i e	1	4	
GG271-14	D	None	AS	1	
GEW77-14	D	None	AMPC	1	

INTERNAT	IONAL GREE	EN CONST	RUCTIO	N – GENERAL (conti	nued)
		CHAP	TER 10		
GG281-14	AS	None	D	1	
GG283-14	D	None	AS	1	
GG203-14	D D		AMPC	2	
GG289-14	D	None	AMPC	1	
GG290-14	A N 4	Mono	AM	1	
GG290-14	AM	None	D	2	
GG297-14	D	None	AS	1	
00000 44	4.0		AS	1	
GG299-14	AS	None	D	2	
GG302-14	D	None	AMPC	1	
00000 44	4.0	44400	AMPC	1	
GG308-14	AS	AMPC	D	2	
GG309-14	D	None	AMPC	1	
GG314-14	D	None	AMPC	1	
		APPEN	DICES		•
CC222 44	4.0	AMDO	AMPC	1, 2, 3	
GG322-14	AS	AMPC	D	4	
GG334-14	AS	None	D	1	
GG338-14	D	None	AS	1	

		OLLAD	TED C		
		Ì	TER 6		
GEW5-14	D	None	AMPC	1, 2	
GEW9-14	D	None	AMPC	1	
GEW14-14	D	None	AS AMPC	<u>1</u> 2	-
GG76-14	D	None	AMPC	<u>-</u> 1	1
GEW22-14	D	None	AMPC	<u>.</u> 1	†
GEW23-14	D	None	AMPC	<u>.</u> 1	1
GEW24-14	AS	None	D	<u>.</u> 1	1
		None	AS	 1	†
GEW26-14	D		AMPC	2	
GEW27-14	D	None	AS	1, 2, 3	
GEW28-14	D	None	AS	1	
GEW29-14	D	None	AS	1	
			AMPC	1	
GEW31-14	AS	AMPC	D	2	1
GEW32-14	D	None	AS	1	
		None	AS	1	
GEW33-14	D		AMPC	2	
GEW34-14	D	None	AMPC	1, 2	
GEW35-14	D	None	AMPC	1	
GEW40-14	D	None	AMPC	1	
GEW41-14	D	None	AMPC	1	
GEW50-14	D	None	AS	1, 2	
GEW52-14	D	None	AS	1	
OL W 32-14			AMPC	2	
GEW54-14	AM	AMPC	AMPC	1, 2	
GEW57-14	D	None	AS	1	
GLVV37-14			AMPC	2	
GEW58-14	D	None	AMPC	1	
GEW60-14	D	None	AS	1	
GEW62-14	AS	None	D	1, 2	
GEW63-14	AS	None	D	1, 2	
GEW65-14	D	None	AMPC	1	
	۸۵		AMPC	1	
GEW66-14	AS AI	AMPC	D	2, 3	
GG78-14	D	None	AS	1, 2, 3, 4	
GEW67-14	AS	AMPC	AMPC	1	
GEW64-14	D	None	AS	1, 2, 3	
GEW70-14	D	None	AS	1	
GEW71-14	D	None	AS	1	1

INTERNATIONAL GREEN CONSTRUCTION CODE – ENERGY/WATER (continued)							
CHAPTER 6 (continued)							
GEW68-14	D	None	AS	1			
GEW78-14	AS	AMPC	AMPC	1			
GEW81-14	AS	None	D	1			
	_	None	AS	1			
GEW83-14	D		D	2			
GEW85-14	D	None	AMPC	1, 2			
00=1.11	1.0	41700	AMPC	1			
GG51-14	AS	AMPC	D	2 (Assembly Action), 3			
CELLIOC 4.4		None	AS	1			
GEW86-14	D		AMPC	2			
GEW87-14	D	None	AMPC	1			
GEW94-14	D	None	AMPC	1			
GEW98-14	D	None	AS	1			
051444444	1.0	41700	AMPC	1, 2			
GEW114-14	AS	AMPC	D	3			
GEW120-14	D	None	AS	1			
GEW119-14	D	None	AS	1			
GEW132-14	D	None	AMPC	1			
GEW133-14	D	None	AMPC	1			
GEW134-14	D	None	AMPC	1			
GEW135-14	AS	None	D	1			
05111406 44		None	AS	1			
GEW136-14	D		AMPC	2			
0511140 44		None	AS	1			
GEW49-14	D		AMPC	2			
05111407.44	4.0	44400	AS	1			
GEW137-14	AS	AMPC	D	2 (Assembly Action), 3, 4, 5			
GEW139-14	D	None	AMPC	1			
GEW145-14	D	None	AMPC	1, 2			
CEW147 14	A N 4	A 1/4 D C	AMPC	1, 2			
GEW147-14	AM	AMPC	D	3, 4			
GG327-14	AS	None	D	1			
GG328-14	AM	None	D	1			
GEW1-14	D	None	AS	1			
OL VV 1-14	D		AMPC	2, 3			
GEW2-14	D	None	AMPC	1			
GEW3-14	D	None	AS	1			
GEVV3-14	U		AMPC	2			

INTERNATIONAL GREEN CONSTRUCTION CODE – ENERGY/WATER (continued) CHAPTER 7						
GEW149-14		None	AS	1		
	D		AMPC	2		
GEW150-14	D	None	AMPC	1		
GEW151-14	D	None	AMPC	1, 2		
GEW154-14	D	None	AMPC	1, 2		
GEW156-14	D	None	AMPC	1		
GEW159-14	AS	AMPC	AMPC	1, 2		
GEW160-14	D	None	AMPC	1		
GEW161-14	D	None	AMPC	1		
GEW162-14	D	None	AMPC	1, 2		
GEW173-14	D	None	AMPC	1		
GEW174-14	D	None	AS	1		
GEW176-14	D	None	AS	1		
			AMPC	2		
GEW180-14	AS	AMPC	AMPC	1, 2		

2014 ICC CODE DEVELOPMENT CYCLE TECHNICAL UPDATES TO THE 2014 PUBLIC COMMENT AGENDA FOR THE PROPOSED CHANGES

TO THE:

INTERNATIONAL GREEN CONSTRUCTION CODE®
-GENERAL
-ENERGY/WATER

SUMMARY OF UPDATES:

INTERNATIONAL ENERGY CONSERVATION CODE - GENERAL:

GG26-14: Moved the Public Comment for, Drumheller,

from GEW26 (PC 1) to GG26 (PC 3) (see page 11)

GG137-14: See change to Item numbers (see page 12)
GG145-14: A portion of the Public Hearing Results is cutoff (see page 12)

INTERNATIONAL ENERGY CONSERVATION CODE - ENERGY/WATER:

GEW26-14: Removed Public Comment for, Drumheller (PC 1).

Shifted the order on the remaining Public Comments (see page 13)

GEW28-14: Removed the strike-out from the footnote (see page 14)

GEW149-14: Change made to the "Requested Action" (see page 14)

INTERNATIONAL GREEN CONSTRUCTION CODE – GENERAL

GG26: This public comment was submitted under GEW26, but belongs to GG26. The new Public Comment order to GG26 is as follows:

GG26-14

Public Comment 1:

Assembly Action requests Approve as Submitted.

Commenter's Reason: This code change proposal is on the agenda for individual consideration because the proposal received a successful assembly action. The assembly action for Approve as Submitted was successful by a vote of 62.57% (117) to 37.43% (70) by eligible members online during the period fo May 19 - May 30, 2014.

Public Comment 2:

David Collins, representing The American Institute of Architects (dcollins@preview-group.com) requests Approve as Submitted.

Commenter's Reason: The AIA supports the approval of GG26 as originally submitted. Section 102.4 of the IgCC contains many references to codes that are used to regulate construction when adopted by the local jurisdition that enforces the codes. The IgCC states that compliance with these standards is necessary for compliance with the IgCC. This code change proposal is a clarification to the code user that the version of these codes must be the version of the IgCC adopted by local jurisdictions, whether that version has been amended by the jurisdiction or not.

Municipalities often use the option to retain older versions of codes. There should not be an automatic reference to standards that have not been adopted. Such provisions can be misleading and confusing to the end users, agencies examining the code for adoption and those charged with compliance.

We urge the membership to vote to approve this change as submitted and guarantee that the codes adopted by the jurisdiction are the codes to be used in the design, construction and application of this code.

Public Comment 3:

Craig Drumheller, representing National Association of Home Builders (CDrumheller@nahb.org) request Approve as Submitted.

Commenter's Reason: This simple change will clarify what the actual requirements are of referenced codes in the IgCC. There are a number of jurisdictions which do NOT adopt the entire family of I-codes or they may have amended a referenced code. For example many western states adopt IAPMO as the plumbing code- so to comply with the IgCC is it necessary to adopt the IPC? Must a building comply with the unamended version of a referenced code, or the code as adopted locally. This language provides a simple solution that adds code adoption flexibility for jurisdictions and clearly states the intension of the IgCC and should be approved As Submitted.

Public Comment 4:

Garrett Stone, Energy Efficient Codes Coalition, representing Energy Efficient Codes Coalition (gas@bbrslaw.com); Maureen Guttman (mguttman@ase.org); Harry Misuriello, American Council for an Energy Efficient Economy (misuriello@verizon.net) request Disapprove.

Commenter's Reason: We recommend that this proposal be Disapproved because it is inconsistent with the concept of the IgCC being an overlay code to the other International Codes. The success and effectiveness of the IgCC depends on the strong foundation already laid by the complete family of International Codes. The IgCC cannot be an "overlay" code in isolation from these other important building codes.

Some concern was raised at the Committee hearing about whether this section requires a jurisdiction to adopt the I-Codes. Section 102.4 requires the project itself to comply with the referenced I-Codes, not the jurisdiction that adopted the IgCC. If a jurisdiction has adopted a different edition of an I-Code, or a different code altogether, that jurisdiction can, of course, add to or modify the referenced codes list. However, if this proposal is successful, it would only require compliance with building, fire, structural, and other requirements if formally adopted by the jurisdiction - essentially changing the requirement from an "opt-out" to

an "opt-in." We believe the default should always be the nation's only complete set of building codes - the International Codes. To allow green buildings to be constructed without a basic set of building requirements could lead to quality and safety concerns in green buildings around the country.

GG137-14: Portions of text from Item #7 has been dropped down to make a new Item #8.

GG137-14

Public Comment 1:

Kathleen Petrie, City of Seattle, Department of Planning and Development, representing Regional Code Collaboration (kathleen.petrie@seattle.gov) requests, Approve as Modified by this Public Comment.

Modify the proposal as follows:

406.1 Building site waste management plan. A building site waste management plan shall be submitted with the construction documents and implemented to divert not less than 90 <u>75</u> percent of the land-clearing debris and excavated clean soils. Land-clearing debris includes rock, trees, stumps and associated vegetation, and does not include invasive plant species. The plan shall include provisions that address all of the following:

- 1. Materials to be diverted from disposal by efficient usage, recycling or reuse on the building site shall be specified.
- 2. Diverted materials shall not be sent to sites that are agricultural land, *flood hazard areas* or *greenfield* sites where development is prohibited by Section 402.1 except where *approved* by the *code official*.
- 3. The effective destruction and disposal of invasive plant species.
- Where contaminated soils are removed, the methods of removal and location where the soils are to be treated and disposed.
- 5. The amount of materials to be diverted shall be specified and shall be calculated by weight or volume, but not both.
- 6. Where the site is located in a federal or state designated quarantine zone for invasive insect species, building site vegetation management shall comply with the quarantine rules.
- 7. Receipts or other documentation related to the reuse, recycling and disposal of land-clearing debris and excavated clean soils shall be maintained through the course of construction. When requested by the *code official*, evidence of diversion shall be provided.
- 8. Invasive To be considered diverted from the landfill, invasive plant species and contaminated soils shall be composted only in facilities that are licensed or permitted to handle the specific feedstock.

Commenter's Reason: Directives for composting invasive species and contaminated soils have been relocated to a new item #8 because they should not be lumped in with the proof of submittal information of item #7.

The proven authorization of a facility being allowed to operate has been increased to both licensing and permitting since this proof varies nationally. Invasive species cannot be fully destroyed if they are not handled correctly.

Therefore, these materials should only be considered diverted if they have been taken to a facility that is specifically equipped to prepare the invasive plant material for compost.

There is some discomfort with increasing the diversion requirement to 90%, so this percentage has been returned back to the 75% requirement currently in the published 2012 IGCC, and will be addressed in a separate public comment.

GG145-14: A portion of the Public Hearing Results did not display.

GG145-14

Committee Action: Disapproved

Committee Reason: The existing requirement of 100 feet is close enough because making it closer might create conflicts with accessibility access requirements for the building. Perhaps there needs to be some consideration of differences for whether the building is in an urban area or not.

Assembly Action: None

INTERNATIONAL GREEN CONSTRUCTION CODE – ENERGY/WATER

GEW26: Previous Public Comment 1 has been moved to GG26. The new order for GEW26 is listed below:

GEW26-14

Public Comment 1:

Charles Foster, representing self (cfoster20187@yahoo.com) requests Approve as Submitted.

Commenter's Reason: I agree that this proposal would lead the IGCC in another direction from its present course but respectfully submit that would be a good thing. The IGCC decided it would try a compliance metric not used in any other code or standard, namely Zepi. The IGCC has not gained widespread acceptance and one of the reasons I believe it is viewed as perhaps too difficult for code officials to enforce and too hard for builders to use. This proposal would change the compliance metric to cost -- something everybody understands and that is used in other similar documents like ASHRAE Std 189.1.

Finally, the Committee reasoning suggests that somehow this proposal would change the compliance metric from source to site. They were mistaken. It would change the metric from source to energy cost. Site energy is not mentioned in this proposal.

Public Comment 2:

Steven Rosenstock, representing Edison Electric Institute (srosenstock@eei.org) requests Approve as Modified by this Public Comment.

Modify the proposal as follows:

602.1.1 yECI. Performance-based designs shall demonstrate an annual energy cost index yECI of not more than 0.8 as determined in accordance with Equations 6-4 6-1a and 6-1b for energy cost reduction and shall demonstrate a CO_2e emissions reduction in accordance with Section 602.2 and Equation 6-2 for CO_2e .

yECI = (EUCIp/EUCI) (Equation 6-1 6-1a)

and

yECl ≤ 0.8 (Equation 6-1b)

where:

EUClp = the proposed annual energy cost for the proposed design of the building and its site calculated in accordance with Section 602.1.2.

EUCI = the base annual energy cost for a baseline building and its site calculated in accordance with Section 602.1.2.

602.1.2 Annual energy cost index. The proposed and base annual energy cost index (ECIP EUCID and ECI EUCI) of the building and building site shall be calculated by a registered design professional in accordance with Equation 6-1 and an annual energy cost simulation software approved by the authority having jurisdiction. The annual energy use shall include all energy used for building functions and its anticipated occupancy

602.2 Annual direct and indirect CO2e emissions. The CO2e emissions calculations for the building and building site shall be determined in accordance with Sections 602.2.1 and 602.2.2. The emissions associated with the proposed design shall be less than or equal to the CO2e emissions associated with the standard reference design in accordance with Equation 6-2.

 $CO_2e pd \ge \le (yECl \times CO_2e srbd)$ (Equation 6-2)

where:

yECI = the calculated annual energy cost ratio in accordance with Section 602.1.1.

CO2e pd = emissions associated with the proposed design.

CO2e srbd = emissions associated with the standard reference budget design in accordance with Section 602.1.2.

Commenter's Reason: The proposed modifications clarify the proposal. This proposal will align the performance path of the IGCC with the performance path of ASHRAE 189.1, which is based on measurable and verifiable energy costs.

GEW28: Remove the strike-out from the footer. This update was posted in the Public Comment Agenda on 8/27/2014:

GEW28-14

TABLE 602.1.2.2
U.S. AVERAGE BUILDING FUELS ENERGY CONVERSION FACTORS BY FUEL TYPE®

FUEL TYPE	ENERGY CONVERSION FACTOR		
Natural Gas ^a	1.09		
Fuel Oil ^a	1.13		
LPG ^a	1.12		
Purchased District Heating - Hot Water	<u>1.35</u>		
Purchased District Heating - Steam	<u>1.45</u>		
District Cooling	0.33 x value in Table 602.1.2.1		
<u>Other</u>	<u>1.1</u>		

a. Source: Gas Technology Institute Source Energy and Emissions Analysis: Tool.

(No changes to the portions of the public comment not shown.)

GG26: Commenter is requesting "Approve as Modified by this Public Comment", not "As Submitted":

GEW149-14

Public Comment 2:

Karen Hobbs, representing Natural Resources Defense Council (khobbs@nrdc.org) requests Approve as Modified by this Public Comment.

(No changes to the portions of the public comment not shown.)