

# GEW9-14

## 601.3

**Proponent:** Jim Edelson, New Building Institute, representing New Buildings Institute (edelson8@gmail.com)

### Revise as follows:

**601.3 Application.** Buildings and their associated building sites shall comply with Section 601.3.1 or Section 601.3.2, and with not less than two of the following sections: C406.2, C406.3, C406.4, C406.6 and C406.7 of the *International Energy Conservation Code*. Tenant spaces shall comply with Section C406.1.1, of the *International Energy Conservation Code*.

**Reason:** The modeled performance compliance path in the IgCC requires a 10% performance improvement over the IECC. However, there are questions about whether the prescriptive path offers equivalent savings. For example, the prescriptive path does not require an efficiency improvement for HVAC equipment above federal minimum standards and does not require reductions in LPD. Additionally, the updates to the 2015 edition of the IECC have absorbed some IgCC prescriptive requirements from the 2012 IgCC, narrowing the performance gap even more. Though the IgCC prescriptive path has not been modeled to the best of our knowledge, it is difficult to believe that the prescriptive path in the IgCC delivers the same level of efficiency as the modeled performance path, making it a compliance loophole.

One of the important changes approved for the 2015 IECC increased the number of packages in Section 406 from three to six. The energy savings of the IgCC prescriptive path can be enhanced by using this existing code language in the IECC. In the 2015 IECC, buildings must comply with one of six packages from section 406 of the IECC. This proposal improves the efficiency of the IgCC prescriptive path by requiring buildings to comply with no less than 2 packages. Because the renewable measure in Section C406.5 is already largely required by Section 610 of the IgCC, there are five packages to select from. This proposal will allow the prescriptive path of the IgCC to deliver a higher level of efficiency more closely equivalent to the modeled performance path. Tenant spaces which generally have less flexibility in their construction options are able to use the tenant provisions of the IECC.

**Cost Impact:** Will increase the cost of construction

**Analysis:** The International Energy Conservation Code sections referenced in the text of this proposal are section numbers for the 2015 Edition. Section C406 of the IECC was substantially revised and this proposal addresses the 2015 provisions.

GEW9-14: 601.3-EDELSON1121