

# GG78-14

## 302.1, 605.1.1

**THIS CODE CHANGE PROPOSAL IS ON THE AGENDA OF THE IgCC ENERGY/WATER CODE DEVELOPMENT COMMITTEE. SEE THE HEARING ORDER FOR THE IgCC ENERGY/WATER CODE DEVELOPMENT COMMITTEE.**

**Proponent:** Gregory Johnson, Greg Johnson Consulting, representing Coalition for Fair Energy Codes (gjohnsonconsulting@gmail.com)

**Revise as follows:**

**605.1.1 Insulation and fenestration criteria.** Where required by Table 302.1, the building thermal envelope shall 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, each U-factor, C-factor, F-factor and SHGC in the specified tables 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 building roof area.

**Revise as follows:**

**302.1 Requirements determined by the jurisdiction.** The jurisdiction shall indicate the following information in Table 302.1 for inclusion in its code adopting ordinance:

1. The jurisdiction shall indicate whether requirements for residential buildings, as indicated in Exception 1 to Section 101.3, are applicable by selecting “Yes” or “No” in Table 302.1. Where “Yes” is selected, the provisions of ICC 700 shall apply and the remainder of this code shall not apply.
2. Where the jurisdiction requires enhanced energy performance for buildings designed on a performance basis, the jurisdiction shall indicate a zEPI of 46 or less in Table 302.1 for each occupancy required to have enhanced energy performance.
3. Where “Yes” or “No” boxes are provided, the jurisdiction shall check the box to indicate “Yes” where that section is to be enforced as a mandatory requirement in the jurisdiction, or “No” where that section is not to be enforced as a mandatory requirement in the jurisdiction.

**TABLE 302.1  
REQUIREMENTS DETERMINED BY THE JURISDICTION**

Section	Section Title or Description and Directives	Jurisdictional Requirements	
<b>CHAPTER 6. ENERGY CONSERVATION, EFFICIENCY AND CO<sub>2</sub>e EMISSION REDUCTION</b>			
302.1, 302.1.1, 602.1	zEPI of Jurisdictional Choice – The jurisdiction shall indicate a zEPI of 46 or less in each occupancy for which it intends to require enhanced energy performance.	Occupancy: zEPI:	
604.1	Automated demand response infrastructure	<input type="checkbox"/> Yes	No
605.1.1	10% thermal envelope stringency increase	<input type="checkbox"/> Yes	No

*(Portions of Table not shown remain unchanged)*

**Reason:** Unlike other International codes, the provisions of the IECC are not scoped as minimum standards. This is verified through a simple check of the Section C101.3 intent provisions of the IECC where no reference to minimum requirements is made. Indeed, each cycle of the development of the IECC since the 2006 edition has sharply increased the stringency of the code.

The increased envelope stringency of the code has not come without policy costs and adoption delays. Other than the administrative provisions, no other requirements of the IECC are so frequently amended than the envelope provisions; very rarely are they made more restrictive.

Lagging adoptions of the 2012 IECC and its envelope provisions provide real world proof that the IECC, in the view of local jurisdictions, exceeds minimum standards. If it was a minimum standard the IECC would more likely be adopted in a timely fashion without the wide-spread amendments to its envelope provisions.

By automatically requiring a 10% increase in stringency over the 2015 IECC's envelope provisions, which are more stringent than those of the 2012 envelope provisions, the IGCC positions itself to be even less likely to be adopted. This does a disservice to the other important energy and environmental issues addressed by the code. It energizes more public resistance to the idea of green building regulation.

This proposal allows the local jurisdiction to assess the local public will for the increased inputs associated with sharply increased envelope provisions.

Where a jurisdiction is comfortable proposing the 10% increase in envelope stringency and its associated impacts it merely has to check the appropriate box. Where that increase jeopardizes the adoption and use of the IgCC the jurisdiction can select the other box.

**Cost Impact:** Will not increase the cost of construction

**GG78-14 : TABLE 302.1-JOHNSON107**

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