

RE151-19

IECC: R405.2 (IRC N1105.2) , ICC Chapter 6 (IRC Chapter 44)

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2018 International Energy Conservation Code

Revise as follows:

R405.2 (IRC N1105.2) Mandatory requirements. Compliance with this section requires that the mandatory provisions identified in Section R401.2 be met. The building thermal envelope shall be greater than or equal to levels of efficiency and Solar Heat Gain Coefficients in Table R402.1.1 or R402.1.3 of the 2009 International Energy Conservation Code. Supply and return ducts not completely inside the *building thermal envelope* shall be insulated to an *R*-value of not less than R-6.

Add new text as follows:

ICC

International Code Council, Inc.
500 New Jersey Avenue NW 6th Floor
Washington DC 20001

IECC-2009: International Energy Conservation Code

Reason: The purpose of this code change is to help ensure long-term energy savings and occupant comfort by applying a reasonable, consistent minimum mandatory thermal envelope backstop across the IECC's two performance-based compliance paths. Since 2015, the newest IECC compliance path, the Energy Rating Index (R406), has already included a minimum mandatory thermal envelope backstop based on the 2009 IECC prescriptive requirements. While a minimum backstop is most important for the ERI, it would also be useful if applied to the simulated performance alternative in Section R405. This proposal will accomplish this objective.

An important part of the logic behind the minimum thermal envelope requirements for the ERI applies to the performance path in Section R405 as well -- a well-built thermal envelope provides long-term energy savings and improved comfort for occupants over the lifetime of the home, and upgrades to the thermal envelope are easiest to incorporate (and most cost-effective) at construction. This is consistent with the intent of the IECC set forth in Section R101.3. Specifically, the IECC is intended to "regulate the design and construction of buildings for the effective use and conservation of energy over the useful life of each building." Regardless of the compliance option selected by the code user, the IECC should require a reasonable minimum level of performance by the home's permanent thermal envelope. As a result, this proposal would apply the same minimum mandatory requirements, including envelope requirements, to Section R405 compliance as currently apply to Section R406 compliance.

To our knowledge, the 2009 IECC backstop in Section R406.2 has been adopted by every state that has adopted the ERI as part of the 2015 or 2018 IECC. A trade-off backstop recognizes the crucial importance of a reasonably efficient thermal envelope, irrespective of the efficiency tradeoffs among various other building components. While we would prefer an even more robust backstop than the 2009 prescriptive requirements (such as the 2015 requirements, which were established in 2018 for ERI compliance that includes on-site generation), the 2009 requirements are at least a reasonable starting place and are consistent with the current backstop for ERI.

Cost Impact: The code change proposal will not increase or decrease the cost of construction

Because this proposal only establishes a trade-off backstop to an alternative compliance path and not a prescriptive code requirement (the prescriptive requirements are already much more efficient than the proposed new backstop levels), and because most homebuilders are likely already meeting or exceeding these requirements, we conclude that there will not necessarily be any cost impact.

Proposal # 3988

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