

## CE2-19

IECC: Section C101.3

### **Proposed Change as Submitted**

**Proponents:** Sharon Bonesteel, Salt River Project, representing Salt River Project (sharon.bonesteel@srpnet.com); Steven Rosenstock, representing Edison Electric Institute (srosenstock@eei.org)

### **2018 International Energy Conservation Code**

**Revise as follows:**

**C101.3 Intent.** This code shall regulate the design and construction of buildings for the effective use and conservation of energy over the useful life of each building. The shift of a load from on-peak period to off-peak shall be considered a part of the effective use of energy. This code is intended to provide flexibility to permit the use of innovative approaches and techniques to achieve this objective. This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.

**Reason:** The conservation of energy and its related cost are the foundation of the IECC. Since the cost of energy is time dependent, it makes sense to include the shift of a load from *on-peak* (most expensive per kw) to *off peak* (least expensive) as a part of the effective use of energy. The definitions for *load*, *on-peak* and *off peak* are included in another code change proposal. Those proposed definitions are as follows:

- **LOAD** A portion of a system that consumes electric energy. The total electrical *load* of a building is the sum of all electricity consuming appliances, lights and systems, necessary for a building to function as designed.
- **ON-PEAK** The time of use during which the cost per kiloWatt-hour (kWh) is the highest and when the maximum generation resources are required to supply electricity to the customer.
- **OFF-PEAK** The time of use during which the cost per kiloWatt-hour (kWh) is the lowest and when generation resources are being underutilized.

The terms are found defined in on-line sources. These could be added to the proposal, if needed, at public comment stage.

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

This code change clarifies that load shifting is a part of the efficient use of energy and does not increase or decrease the cost of construction.

CE2-19

### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The Intent statement adequately covers energy conservation in the broadest sense and does not need to include a list of specific methodologies. The existing language doesn't exclude the technology discussed by the proponent. The word 'shall' is problematic in the proposed sentence in that it appears to creating a new technical requirement. (Vote: 14-1)

**Assembly Action:**

**None**

CE2-19

### **Individual Consideration Agenda**

#### **Public Comment 1:**

IECC@: C101.3, SECTION C202

**Proponents:**

Steven Rosenstock, Edison Electric Institute, representing Edison Electric Institute (srosenstock@eei.org); Sharon Bonesteel AIA CBO CP, salt river project, representing Salt River Project (sharon.bonesteel@srpnet.com)

requests As Modified by Public Comment

**Modify as follows:**

## 2018 International Energy Conservation Code

**C101.3 Intent.** This code shall regulate the design and construction of buildings for the effective use and conservation of energy over the useful life of each building-, ~~including the shift of a load from an on-peak period to an off-peak period, shall be considered a part of the effective use of energy.~~ This code is intended to provide flexibility to permit the use of innovative approaches and techniques to achieve this objective. This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.

### SECTION C202 GENERAL DEFINITIONS

**LOAD.** A portion of a system that consumes electric energy. The total electrical load of a building is the sum of all electricity consuming appliances, equipment, and systems necessary for a building to function as designed.

**ON-PEAK.** The time of use during which the cost per kiloWatt-hour (kWh) is the highest and when the maximum generation resources are required to supply electricity to the customer.

**OFF-PEAK.** The time of use during which the cost per kiloWatt-hour (kWh) is the lowest and when generation resources are being underutilized.

**Commenter's Reason:** This proposed modification addresses the concerns of the committee by removing the word "shall" and by adding definitions to clarify what is meant by the new language. As more renewable energy is added to the grid and to buildings, the use of load shifting will be more important.

**Cost Impact:** The net effect of the public comment and code change proposal will not increase or decrease the cost of construction. The change to the intent and the addition of new definitions do not change the cost of construction, as they do not add any new requirements to the code.

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Public Comment# 1287