

# CE3-19 Part I

IECC: Part I: C101.3

IECC: Part II: R101.3(N1101.2)

## **Proposed Change as Submitted**

**Proponents:** Joseph H. Cain, Solar Energy Industries Association (SEIA), representing Solar Energy Industries Association (SEIA) (JoeCainPE@gmail.com)

**THIS IS A 2 PART CODE CHANGE. PART I WILL BE HEARD BY THE IECC- COMMERCIAL COMMITTEE. PART II WILL BE HEARD BY THE IECC-RESIDENTIAL COMMITTEE. SEE THE TENTATIVE HEARING ORDER FOR THESE COMMITTEES.**

## **2018 International Energy Conservation Code**

**Revise as follows:**

**C101.3 Intent.** This code shall regulate the design and construction of buildings and systems for the effective use and conservation of energy over the useful life of each building, including effective integration of energy efficiency measures, renewable energy systems, and energy storage systems. This code is intended to provide flexibility to permit the use of innovative approaches and techniques, including innovative approaches and techniques to achieve this objective- that achieve the most cost-effective means of compliance. This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.

**Reason:** Renewable energy systems are an important component of the IECC, but the Intent section is presently silent on them. Effective integration of energy efficiency measures and renewable energy systems is critical to the future of energy codes and green/stretch/reach codes. At the time of submittal of these code change proposals, there are four states with 100% renewable energy goals: Hawaii, California, New Jersey, and New York. Other communities are committing to renewable energy goals through their own local renewable goals for power supply or for installation of renewable energy systems.

As grid penetration of renewable energy systems increases, the need to energy storage systems -- mostly battery storage -- also increases. The Intent section of the IECC should evolve with our societal needs, as by the time this edition is in effect there will be even more renewable energy systems and battery storage systems.

Renewable energy is already explicitly included in the IECC in multiple locations, including, but not limited to: Section C202 Definitions; Section C407.3 Performance-based compliance; Appendix CA Solar Ready Zone; Section R406 Energy Rating Index; Appendix RA Solar Ready Provisions. The Intent section needs to catch up with the provisions within the code.

**Cost Impact:** The code change proposal will not increase or decrease the cost of construction  
This proposal represents a forward-thinking clarification of intent only, with no increase or decrease in cost of construction.

CE3-19 Part I

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The technologies are already allowed by the existing broad text of the Intent statement. Including 'most cost effective' in the intent statement sets a dangerous threshold for judgement of future changes. Cost effective is not defined. As the Intent comes into play in the review of alternate methods and for above code programs, a determination of most cost effective would impose a difficult burden on code officials. (Vote 13-2)

**Assembly Action:**

**None**

CE3-19 Part I

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## **Individual Consideration Agenda**

## **Public Comment 1:**

IECC@: C101.3

### **Proponents:**

Joseph H. Cain, P.E., Solar Energy Industries Association (SEIA), representing Solar Energy Industries Association (SEIA)  
(JoeCainPE@gmail.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 and systems for the effective use and conservation of energy over the useful life of each building, including effective integration of energy efficiency measures, renewable energy systems, and energy storage systems. This code is intended to provide flexibility to permit the use of innovative approaches and techniques, ~~including innovative approaches and techniques that achieve the most cost-effective means of compliance to achieve this objective.~~ This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.

**Commenter's Reason:** This proposal and this public comment seeks to include "effective integration of energy efficiency measures, renewable energy systems, and energy storage systems."

This public comment reverts the second sentence back to the same text as found in the 2018 IECC intent section.

**Cost Impact:** The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

This proposal represents a forward-thinking clarification of intent only, with no increase or decrease in cost of construction.

Public Comment# 2172

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## CE3-19 Part II

IECC: R101.3 (IRC N1101.2)

### Proposed Change as Submitted

**Proponents:** Joseph H. Cain, Solar Energy Industries Association (SEIA), representing Solar Energy Industries Association (SEIA)  
(JoeCainPE@gmail.com)

## 2018 International Energy Conservation Code

Revise as follows:

**R101.3 (IRC N1101.2) Intent.** This code shall regulate the design and construction of buildings and systems for the effective use and conservation of energy over the useful life of each building, including effective integration of energy efficiency measures, renewable energy systems, and energy storage systems. This code is intended to provide flexibility to permit the use of innovative approaches and techniques, including innovative approaches and techniques ~~to achieve this objective, that achieve the most cost-effective means of compliance~~. This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.

**Reason:** Renewable energy systems are an important component of the IECC, but the Intent section is presently silent on them. Effective integration of energy efficiency measures and renewable energy systems is critical to the future of energy codes and green/stretch/reach codes. At the time of submittal of these code change proposals, there are four states with 100% renewable energy goals: Hawaii, California, New Jersey, and New York. Other communities are committing to renewable energy goals through their own local renewable goals for power supply or for installation of renewable energy systems.

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Renewable energy is already explicitly included in the IECC in multiple locations, including, but not limited to: Section C202 Definitions; Section C407.3 Performance-based compliance; Appendix CA Solar Ready Zone; Section R406 Energy Rating Index; Appendix RA Solar Ready Provisions. The Intent section needs to catch up with the provisions within the code.

**Cost Impact:** The code change proposal will not increase or decrease the cost of construction  
This proposal represents a forward-thinking clarification of intent only, with no increase or decrease in cost of construction.

CE3-19 Part II

### Public Hearing Results

**Committee Action:**

**Disapproved**

**Committee Reason:** The Intent paragraph is sufficient as written and does not need a list of things which address efficient use of energy. The insertion of determining whether the measures in the code or proposed for the code should not be inserted in the Intent statement. (Vote: 9-2)

**Assembly Action:**

**None**

CE3-19 Part II

### Individual Consideration Agenda

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

IECC@: R101.3 (IRC N1101.2)

**Proponents:**

Joseph H. Cain, P.E., Solar Energy Industries Association (SEIA), representing Solar Energy Industries Association (SEIA)  
(JoeCainPE@gmail.com)

**Modify as follows:**

## **2018 International Energy Conservation Code**

**R101.3 (IRC N1101.2) Intent.** This code shall regulate the design and construction of *buildings* and systems for the effective use and conservation of energy over the useful life of each building, including effective integration of energy efficiency measures, *renewable energy systems*, and energy storage systems. This code is intended to provide flexibility to permit the use of innovative approaches and techniques, ~~including innovative approaches and techniques that achieve the most cost-effective means of compliance to achieve this objective.~~ This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.

**Commenter's Reason:** This proposal and this public comment seeks to include "effective integration of energy efficiency measures, renewable energy systems, and energy storage systems."

This public comment reverts the second sentence back to the same text as found in the 2018 IECC intent section.

**Cost Impact:** The net effect of the public comment and code change proposal will not increase or decrease the cost of construction. This proposal represents a forward-thinking clarification of intent only, with no increase or decrease in cost of construction.