

CE69-19

IECC@: TABLE C402.1.3, TABLE C402.1.4

Proposed Change as Submitted

Proponents: William Fay, Energy-Efficient Codes Coalition, representing Energy-Efficient Codes Coalition (bfay@ase.org); Harry Misuriello, representing American Council for an Energy-Efficient Economy (misuriello@verizon.net)

2018 International Energy Conservation Code

Revise as follows:

(Portions of table not shown remain unchanged)

**TABLE C402.1.3
OPAQUE THERMAL ENVELOPE INSULATION COMPONENT MINIMUM REQUIREMENTS, R-
VALUE METHOD^{a, i}**

Slab-on-grade floors															
Unheated slabs	NR	NR	NR	NR	NR	NR	R-10 for 24" below	R-10 for 24" below	R-10 for 24" below	R-10 for 24" below	R-10 for 24" below	R-15 for 24" below	R-15 for 24" below	R-15 for 24" below	R-20 for 24" below
							R-20 for 24" below	R-20 for 48" below	R-20 for 48" below	R-25 for 48" below					
Heated slabs ^h	R-7.5 for 12" below+ R-5 full slab	R-7.5 for 12" below+ R-5 full slab	R-7.5 for 12" below+ R-5 full slab	R-7.5 for 12" below+ R-5 full slab	R-10 for 24" below+ R-5 full slab	R-10 for 24" below+ R-5 full slab	R-15 for 24" below+ R-5 full slab	R-15 for 24" below+ R-5 full slab	R-15 for 36" below+ R-5 full slab	R-15 for 36" below+ R-5 full slab	R-15 for 36" below+ R-5 full slab	R-20 for 48" below+ R-5 full slab	R-20 for 48" below+ R-5 full slab	R-20 for 48" below+ R-5 full slab	R-20 for 48" below+ R-5 full slab

For SI: 1 inch = 25.4 mm, 1 pound per square foot = 4.88 kg/m², 1 pound per cubic foot = 16 kg/m³.

ci = Continuous insulation, NR = No Requirement, LS = Liner System.

- a. Assembly descriptions can be found in ANSI/ASHRAE/IESNA Appendix A.
- b. Where using *R*-value compliance method, a thermal spacer block shall be provided, otherwise use the *U*-factor compliance method in Table C402.1.4.
- c. R-5.7ci is allowed to be substituted with concrete block walls complying with ASTM C90, ungrouted or partially grouted at 32 inches or less on center vertically and 48 inches or less on center horizontally, with ungrouted cores filled with materials having a maximum thermal conductivity of 0.44 Btu-in/h-ft² °F.
- d. Where heated slabs are below grade, below-grade walls shall comply with the exterior insulation requirements for heated slabs.
- e. "Mass floors" shall be in accordance with Section C402.2.3.
- f. Steel floor joist systems shall be insulated to R-38.
- g. "Mass walls" shall be in accordance with Section C402.2.2.
- h. The first value is for perimeter insulation and the second value is for slab insulation. Perimeter insulation is not required to extend below the bottom of the slab.
- i. Not applicable to garage doors. See Table C402.1.4.

(Portions of table not shown remain unchanged)

**TABLE C402.1.4
OPAQUE THERMAL ENVELOPE ASSEMBLY MAXIMUM REQUIREMENTS, U-FACTOR
METHOD^{a, b}**

Slab-on-grade floors																
Unheated slabs	F-0.73 ^c	F-0.73 ^c	F-0.73 ^c	F-0.73 ^c	F-0.73 ^c	F-0.73 ^c	F-0.54	F-0.54	F-0.54	F-0.54	F-0.54	F-0.52	F-0.40	F-0.40	F-0.40	F-0.40
													F-0.51	F-0.434	F-0.434	F-0.424
Heated slabs ^d	F-1.02 0.74	F-1.02 0.74	F-1.02 0.74	F-1.02 0.74	F-0.90 0.74	F-0.90 0.74	F-0.86 0.64	F-0.86 0.64	F-0.79 0.64	F-0.79 0.64	F-0.79 0.55	F-0.69 0.55	F-0.69 0.55	F-0.69 0.55	F-0.69 0.55	F-0.69 0.55

For SI: 1 pound per square foot = 4.88 kg/m², 1 pound per cubic foot = 16 kg/m³.
ci = Continuous insulation, NR = No Requirement, LS = Liner System.

- Where assembly *U*-factors, *C*-factors, and *F*-factors are established in ANSI/ASHRAE/IESNA 90.1 Appendix A, such opaque assemblies shall be a compliance alternative where those values meet the criteria of this table, and provided that the construction, excluding the cladding system on walls, complies with the appropriate construction details from ANSI/ASHRAE/ISNEA 90.1 Appendix A.
- Where *U*-factors have been established by testing in accordance with ASTM C1363, such opaque assemblies shall be a compliance alternative where those values meet the criteria of this table. The *R*-value of continuous insulation shall be permitted to be added to or subtracted from the original tested design.
- Where heated slabs are below grade, below-grade walls shall comply with the *U*-factor requirements for above-grade mass walls.
- "Mass floors" shall be in accordance with Section C402.2.3.
- These *C*-, *F*- and *U*-factors are based on assemblies that are not required to contain insulation.
- The first value is for perimeter insulation and the second value is for full slab insulation.
- "Mass walls" shall be in accordance with Section C402.2.2.

Reason: The purpose of this code change proposal is to reduce building energy costs and improve long-term energy efficiency by adopting ASHRAE's more efficient and cost-effective requirements for unheated slab insulation in climate zones 7-8. The current IECC F-factors for unheated slabs in these climate zones do not correspond with the R-value requirements in Table C402.1.3, nor do they correspond with F-factor data for common slab-on-grade floor assemblies per Normative Appendix A of ASHRAE Standard 90.1-2016. We believe the F-factors in the IECC are in error, and we propose adopting both ASHRAE's R-values and F-factors for these climate zones. The result will be improved efficiency and consistency across the IECC's prescriptive tables. The building envelope typically remains the same for many years after construction and it is particularly important to capture as much cost-effective energy efficiency as possible at construction. After all, the intent of the IECC (C101.3) is to "regulate the design and construction of buildings for the effective use and conservation of energy over the useful life of each building."

Cost Impact: The code change proposal will increase the cost of construction

The improved F-factors and R-values in Tables C402.1.3 and C402.1.4 will typically require the addition of more insulation or other efficiency improvements in the IECC's performance-based compliance paths. However, each component value selected by ASHRAE for Standard 90.1 has gone through a rigorous energy-savings and cost-effectiveness analysis and consensus vetting from affected interests, so even in cases where construction costs are increased, the improvements will be achievable and cost-effective over the useful life of the product. This proposal will also correct an error in the IECC Table C402.1.4 and bring consistency between the two prescriptive tables, simplifying compliance and enforcement.

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Public Hearing Results

Errata: This proposal includes published errata

Go to <https://www.iccsafe.org/wp-content/uploads/Group-B-Consolidated-Monograph-Updates.pdf>.

Committee Action:

As Submitted

Committee Reason: These are cost effective updates (11-4).

Assembly Action:

None

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Individual Consideration Agenda

Public Comment 1:

Proponents:

Jonathan Humble, FAIA, NCARB, LEED BD+C, American Iron and Steel Institute, representing American Iron and Steel Institute (Jhumble@steel.org)

requests Disapprove

Commenter's Reason: This public comment covers CE61-19, CE63-19, CE64-19, CE66-19, CE68-19 and CE69-19. We recommend disapproval for the following reasons.

The values proposed only represent those ASHRAE Standard 90.1 values that were more stringent than the current IECC (Which represents 1/3rd of the total number of IECC table cells in both tables). When reviewing the taped testimony we found that the supporters conspicuously avoided responding directly to questions raised asking why the other values not chosen from ASHRAE Standard 90.1 were not appropriate.

The proponents stated that this proposal represents "a positive life cycle savings for the life of the building", even though no cost analysis substantiating the proposal was cited in the reason statement.

The supporters testified they had an analysis that substantiated their proposal, however no such analysis was cited in the reason statement nor was there evidence that it was made available to the general public at the hearing.

Supporters cited the proposal represented the "best value", however the reason statement does not substantiate what constitutes a best value.

The supporters talked of errors that they had corrected, however the reason statement fails to cite what those errors were, why the ICC membership was wrong in approving the errors at previous hearings, and if they were errors why the proponents did not submit a request to change the errors to ICC staff.

In view of the above contradictions and short falls, we recommend that these proposals be disapproved.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction
No change to code.

Public Comment# 1730