

January 8, 2024

Robert Coslow, Administrator of Professional Services
Capital Development Board
401 S. Spring Street
Stratton Building, 3rd Floor
Springfield, Illinois 62706

Re: MEEA’s comments in support of the approval of the Illinois stretch energy codes for residential and commercial buildings

Dear Mr. Coslow and the Capital Development Board,

Thank you for the opportunity to provide comments on the proposed language for the Illinois residential and commercial stretch energy codes (“stretch codes”). The Midwest Energy Efficiency Alliance (MEEA) is a membership-based nonprofit organization serving as a collaborative network, promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities. MEEA has experience supporting states and municipalities across the region to develop building energy policies and implement codes programs and trainings.

MEEA would like to commend the Capital Development Board (CDB) and the Illinois Energy Conservation Advisory Council (IECAC) for their ongoing work developing the stretch codes. It is quite an undertaking to create a statewide stretch code with stakeholder engagement, but it is so critical that the CDB has provided this opportunity for public comment and feedback as it makes the entire process more transparent and comprehensive. MEEA is very pleased with the proposed stretch code provisions and believes they will provide numerous economic, health, and resilience benefits to residents and businesses living and working in Illinois.

As the CDB considers the proposed language, MEEA would like to emphasize that 1) the stretch codes as currently written meet the requirements set forth in Illinois Public Act 102-0662, the Climate and Equitable Jobs Act (CEJA), 2) the stretch codes as currently written are attractive to municipalities as they are optional to adopt and offer flexibility for compliance, and 3) there are utility programs and assistance available to offer support to municipalities that choose to adopt. That being said, MEEA strongly recommends the approval of the proposed stretch code language for residential and commercial buildings.

CEJA directs that the Illinois stretch codes meet certain site energy index targets and, in order to ensure those targets are met, the index *only* takes into account energy conservation measures (rather than, for example, on-site or off-site energy production). See below tables.

Stretch Code Version	Implementation Date	Site Energy Index	Performance Targets	Code Created By	Stretch Code Version	Implementation Date	Site Energy Index	Performance Targets	Code Created By
2024 Residential Stretch Code	December 31, 2023	0.50	At least 50% more efficient than 2006 IECC	Set by CDB by June 30, 2024	2024 Commercial Stretch Code	December 31, 2023	0.60	At least 40% more efficient than 2006 IECC	Set by CDB by June 30, 2024
2026 Residential Stretch Code	December 31, 2025	0.40-0.42	At least 60% more efficient than 2006 IECC*	Set by CDB in 2025	2026 Commercial Stretch Code	December 31, 2025	0.50	At least 50% more efficient than 2006 IECC	Set by CDB in 2025
2029 Residential Stretch Code	December 31, 2028	0.33 - 0.35	At least 67% more efficient than 2006 IECC**	Set by CDB in 2028	2029 Commercial Stretch Code	December 31, 2028	0.44	At least 56% more efficient than 2006 IECC	Set by CDB in 2028
2032 Residential Stretch Code	December 31, 2031	0.25	At least 75% more efficient than 2006 IECC	Set by CDB in 2031	2032 Commercial Stretch Code	December 31, 2031	0.39	At least 61% more efficient than 2006 IECC	Set by CDB in 2031



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The stretch codes as written and proposed to the CDB include the provisions necessary to meet CEJA's energy efficiency objectives, and so will help Illinois reduce both its emissions and energy spending.

The stretch codes are appealing to municipalities as they are optional to adopt and offer project-level flexibility, allowing builders and designers to take different pathways to achieve the same goals. It is crucial that the stretch codes maintain their alternative compliance paths.

And finally, for those Illinois municipalities that do choose to adopt the stretch codes, there are utility programs available for additional support. Assistance may include educative resources, targeted training, incentives and rebates, and plan review assistance. Each of these strategies will help citizens better understand the codes and implement them successfully. In addition to state-created resources, designers and builders in these communities can feel confident that they won't be left to fend for themselves.

Based on the language provided, MEEA believes the CDB should take the necessary steps to approve the Illinois stretch energy codes for residential and commercial buildings. Adoption of the stretch codes will reduce energy use and costs for residents and business owners, create more comfortable and healthier indoor environments and lower the energy burden on low-income residents by freeing up scarce financial resources that could significantly impact their way of life. Adopting the stretch codes would also result in more efficient, resilient buildings and put the state on track to meet its established climate goals.

If you have any questions or need more information, please contact Maddie Liput at mliput@mwalliance.org. Thank you for your time and consideration.

Sincerely,

Paige Knutsen
Executive Director