MEEA
MIDWEST ENERGY EFFICIENCY ALLIANCE

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March 15, 2024

Illinois Senate Energy & Public Utilities Committee
401 South Second Street, Room 212
Springfield, Illinois 62701

**Re: MEEA's comments on regulating construction standards for insulation within the Energy Efficient Building Act**

Dear Chairman Stadelman and Members of the Energy & Public Utilities Committee,

Thank you for the opportunity to speak on the regulation of insulation standards within the Energy Efficient Building Act (Act). The Midwest Energy Efficiency Alliance (MEEA) is a member-based, non-profit organization promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities. We have worked in Illinois and other states to provide technical assistance and education on energy efficient building policies since 2009.

MEEA supports the construction of an attic thermal envelope with R-values greater than 30 and U-factors lower than 0.038. MEEA also supports new homes having maximum air leakage rates of less than two and a half air changes per hour. Both methods are considered best practices for improving energy efficiency in buildings.

Additionally, MEEA supports and promotes the health and safety of homeowners and occupants. Energy codes, just like other types of construction codes (e.g., fire, electrical, mechanical), ensure such health and safety. They do this by providing better indoor air quality and creating more reliable, resilient homes in times of emergency or extreme weather events, all by guaranteeing minimum standard safeguards that most homebuyers do not know to ask about or demand (e.g., insulation in the attic).

The process by which the Illinois Energy Conservation Code (IECC) is developed also provides for such health and safety. In accordance with the Act, updates to the IECC's standards are automatically conducted every three years, concurrent with updates to the International Code Council's (ICC) model energy code. The proposed language is then reviewed by various administrative and technical state agencies (with ample opportunity for public input) and ultimately determined based on concerns such as health and safety, cost-effectiveness and environmental impact. If the code standards development/update process is shifted to be the sole responsibility of the legislature, the state will not see progress in these areas.

**Updating code standards that have been placed in statute would require further legislative action – something that is unpredictable and cumbersome.** As mentioned above, the ICC updates its model energy code every three years purposefully, as it provides states with consistent, incremental steps to adopt and implement with ease. Each new code standard is a steppingstone towards the next so as not to overburden the building industry. Moreover, these model energy codes become more efficient and cost-effective with each new version that is developed.

In short, model standards (i.e., the standards that continually achieve energy and cost savings and reduce greenhouse gas emissions) are constantly evolving, and they are doing so because new construction techniques and technologies are constantly being discovered and utilized.

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**It requires a broad range of experts and stakeholders to consider and determine the appropriate code standards that should be in place for the state**. This burden should not fall solely on legislators. Rather, it should be a collective effort among those who have training and expertise in topics like building science, energy use and efficiency, economics, environmental impact assessment, environmental justice and more. People spend the majority of their lives inside buildings; therefore, it is crucial that they are safe, affordable and environmentally sustainable, and energy codes guarantee these protections by prescribing strong, educated building standards.

**Illinois' current process for updating its code standards provides ease for consistent progress and collaboration**. As directed by the Act,[1] the Illinois Capital Development Board (CDB) reviews and adopts the latest published edition of the ICC's International Energy Conservation Code within one year of its publication, thus ensuring the state stays up to date with those evolving model standards.

Throughout this process, the CDB is required to seek input from the public and from entities affected by the new code, such as building and design professionals, code officials, municipal staff, non-profit or advocacy organizations, *etc*. To ensure input from these stakeholders, the CDB created the Illinois Energy Code Advisory Council (ILECAC), which has representatives from each of the various groups. ILECAC ultimately comes up with proposed standards and recommends them to the CDB for approval or rejection. If approved, the language is submitted to Illinois' Joint Committee on Administrative Rules for final acceptance and implementation. Perhaps not surprisingly, *a wide variety of feedback and technical expertise is submitted and considered during each stage of this process*, making it one that is extremely thorough and deliberate.

Limiting the regulation of insulation standards within the Energy Efficient Building Act is harmful to the state as it would lead to less overall health and safety of Illinois homeowners and occupants and less affordable homes for people to live in. These issues can easily be avoided if the state continues to regularly review and adopt improved energy code standards in accordance with the Act as written.

If you have any questions about this testimony, noted reports and references or general impact and analysis of building energy codes, please contact Maddie Liput, Building Codes & Policy Manager for MEEA at mliput@mwalliance.org. Thank you for your consideration.

Sincerely,

Paige Knutsen

Paige Knutsen, Executive Director

[1] 20 ILCS 3125