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Climate and Energy Finance and Policy
10 State Office Building
100 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

Re: MEEA's comments on the Importance of Adopting Strong Energy Codes for Minnesota's Future

Dear Chairwoman Acomb and Members of the Climate and Energy Finance and Policy Committee,

Thank you for the opportunity to provide comments on the proposed modifications to the state building code, particularly regarding the adoption of residential energy code standards and the establishment of programs that support the implementation of these codes. 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. MEEA works to support states and municipalities across our 13-state region to develop building energy policies and implement codes programs and trainings. We have worked in Minnesota and other states to provide technical assistance and education on energy efficient building policies since 2009.

Minnesota is lagging behind in its adoption of updated energy codes, currently at a weakened version of the 2012 IECC, a code that is more than twelve years old. It is imperative for Minnesota to adopt and maintain robust energy codes to ensure that its homes are safe, efficient and affordable for residents. MEEA supports adopting each newly published edition of the International Energy Conservation Code (IECC) or a more efficient standard for residential buildings.

1. Strong energy codes are the most cost-effective way to ensure lower utility bills.

Strong energy codes are the most cost-effective way to ensure lower utility bills for homeowners. By reducing energy consumption through efficient building practices, residents can enjoy significant savings on their monthly energy expenses. The adoption of updated energy codes, such as the latest published edition of the IECC, presents an opportunity for Minnesota to enhance affordability and promote long-term financial stability for homeowners. Adopting each new published edition presents a cost-effective way to reduce the energy consumption of homes in Minnesota and save residents money. In fact, the International Code Council (ICC) assesses cost-effectiveness whenever it updates each model energy code, and each development is intended to be a steady, incremental change for the building industry. Skipping code cycles means increasing first-time construction costs for builders when the codes are finally brought up to date on current building practices and standards.

2. Stronger building energy codes affect the lifetime of a building – not just its initial construction.

The life of a building does not end as soon as it has been constructed. A builder touches a home one time – families live in a home for years, and those families deserve a safe, efficient, cost-effective building in which to live. It is essential to recognize that the impact of energy codes extends beyond the initial construction phase of a building. Building owners and occupants bear the long-term consequences of inefficient homes, including higher energy bills and increased maintenance costs. Alternatively, homeowners see long-term savings and safety improvements when homes are built to adequate energy standards. By prioritizing energy efficiency in building codes, Minnesota can ensure that homes are built to high performance standards, providing lasting benefits to residents and contributing to a sustainable built environment.

3. Updated codes improve construction quality and provide opportunities for designers and builders to utilize current techniques and technologies.

Like all industries, building construction techniques and technologies are ever evolving. Newer building energy codes leverage the latest building science and technology while also providing various building professionals with valuable educational opportunities to learn and utilize these new techniques and technologies. By adopting and implementing the most up-to-date editions of the IECC, the state will see increased economic development and technical innovation within the construction industry, enhancing the skills and competitiveness of the Minnesota workforce. The state should continue to adopt the most up-to-date editions to minimize the chance of an undertrained workforce and an out-of-date building stock that wastes energy and money.

4. There are utility programs and assistance available to offer code compliance support.

With federal funding dollars and a statewide utility-funded energy code compliance program, education and technical assistance will be at an all-time high for construction trades in Minnesota. Municipalities and stakeholders can leverage these utility programs and assistance to facilitate code compliance and implementation. These resources, including educative materials, incentives and plan review assistance play a vital role in supporting designers and builders as they navigate energy code requirements. MEEA utilizes federal resources to also provide support, including analysis of energy savings and cost impacts associated with code adoption, comparative analysis of future code options, customized educational materials, web-based or in-person training programs, and compliance resources and software tools (like COMcheck and REScheck). Collaboration between utilities, local jurisdictions and state agencies can strengthen compliance efforts and promote the widespread adoption of energy-efficient practices.

5. Stronger residential energy codes will bring Minnesota closer to its energy savings and climate goals.

Stronger residential energy codes are instrumental in advancing Minnesota's climate and sustainability objectives. The adoption of energy-efficient building practices aligns with initiatives such as Minnesota's Climate Action Framework, in which Improving energy efficiency in buildings and industrial processes is a top priority.¹ Section 4.2 of the Climate Action Framework states that in order to maintain clean energy and efficient buildings, Minnesota "must update building codes and construction standards to mandate net-zero energy construction," recognizing that incorporating energy efficiency in new buildings is much less expensive than retrofitting existing structures.

Reducing energy consumption in residential buildings would help make significant progress towards Minnesota's climate goals. The Minnesota commercial energy code is implementing a standard to meet 80 percent reduction in annual net energy consumption or greater by 2036, as compared to a 2004 model code baseline.² If the residential energy code aligned with a similar standard to the commercial code, to achieve a 70 percent reduction by 2038, it would ensure that all Minnesota buildings are operating as efficiently as possible. These measures would align with the Department of Labor and Industry's goal of "conducting a rulemaking process to adopt the most current building codes for commercial and large multi-family residential dwellings, which will improve the energy efficiency of these buildings."³

In conclusion, Minnesota should prioritize systematic updates of strong energy codes for Minnesota's residential buildings. By embracing energy efficiency as a cornerstone of its building practices, Minnesota can enhance affordability, promote workforce development and accelerate progress towards the state's climate and sustainability goals.

If you have any questions about these comments, noted reports and references or general impact and analysis of building energy codes, please contact Isabella Gross, MEEA's Building Codes & Policy Associate, at igross@mwalliance.org. Thank you for your consideration.

Sincerely,



Paige Knutsen, Executive Director

¹ [Climate Action Framework | Our Minnesota Climate \(state.mn.us\)](#)

² [SF 3035A Conference Committee Report - 93rd Legislature \(2023 - 2024\) \(mn.gov\)](#)

³ [Minnesota's Climate Action Framework \(state.mn.us\)](#)