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January 23, 2023

Nebraska Urban Affairs Committee  
1445 K Street, Room 1510  
Lincoln, NE 68508

Re: MEEA comments in support of the full adoption of the 2021 International Energy Conservation Code

Dear Chairman McKinney and members of the Nebraska Urban Affairs Committee,

Thank you for the opportunity to provide comments on the adoption of the 2021 International Energy Conservation Code (IECC). The Midwest Energy Efficiency Alliance (MEEA) is a member-based non-profit 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 been working in Nebraska since 2012 when we helped launch the Nebraska Energy Code Compliance Collaborative and have provided technical assistance and education on building science and energy code compliance since 2020.

We strongly recommend the adoption of the 2021 IECC without weakening amendments as the statewide minimum building energy code for residential and commercial buildings. In addition to continuing to showcase Nebraska as a leader in energy efficient buildings, adopting the unweakened<sup>1</sup> 2021 IECC will provide Nebraska with the following benefits:

- Reduced energy use and utility bills for residents and businesses
- Increased occupant comfort and improved indoor air quality
- Increased resilience, allowing residents to safely shelter in place longer during extreme weather events and/or outages
- Improved electric grid reliability
- Increased cost-effectiveness by installing efficiency measures at initial construction
- Staying up-to-date with the latest model code edition, which is developed through a rigorous stakeholder engagement process of multiple industries
- A larger workforce that is better prepared for future changes in building practices, energy efficiency requirements and new technologies

### **The Unweakened 2021 IECC Benefits Nebraska Residents and Businesses**

The U.S. Department of Energy (DOE) has determined that the 2021 IECC would improve energy efficiency in buildings compared to the 2018 IECC. DOE analysis indicates that buildings meeting

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<sup>1</sup> "Unweakened" refers to a version of the 2021 IECC that has not been amended to include reduced or lesser building standards than those contained in the full, unamended 2021 IECC.



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the 2021 IECC result in Nebraska-specific energy savings of 7.9 percent.<sup>2</sup> If adopted, the DOE estimates Nebraskans will save \$1,036,000 within the first year, resulting in more than \$327 million dollars in energy savings over the next 30 years.<sup>3</sup>

The unweakened 2021 IECC would reduce the burden on Nebraska residents and businesses beyond lower energy bills. More efficient buildings provide increased comfort and better indoor air quality. Improved energy efficiency also provides meaningful resilience benefits. Homes built to newer codes are more comfortable, even in extreme temperatures, and allow for occupants to safely shelter in place during extreme weather events.<sup>4</sup> A strong energy code also makes the grid more reliable by reducing energy use in buildings and lowering overall energy demand.<sup>5</sup>

### **The Unweakened 2021 IECC Benefits the Building Industry**

The model codes are designed to incrementally increase in efficiency, minimizing “big leaps.” Not updating codes regularly creates bigger leaps in standards and increases the potential burden on the building industry. By adopting the most up-to-date model code (2021 IECC), which is developed through a rigorous stakeholder engagement process of multiple industries, the state would be reducing its potential burden on industry.

Increased cost is always a point of concern with energy code adoption processes. It is important to remember that the building industry touches a home once – at the point of its construction – but that the residents that live in that home will feel the impact of its construction practices far decades into the future. It is also much more cost-effective to include energy efficiency at the time of initial construction than during renovations. The energy code is considered the floor – the least efficient building that can be constructed by law – and the builders that are only building to the bare minimum may see a slight cost increase, but that is far outweighed by the savings realized through reduced energy use and reduced health care costs for building occupants. For builders that are already building “better than code,” there should be little to no actual increase in cost to meet an updated energy code. Adopting the 2021 IECC will also result in economic development and job creation for Nebraska. This occurs in two ways: 1. by reducing utility bills, which results in an increase in disposable income, and 2. by increasing construction-related activities in the state.<sup>6</sup>

Additionally, the DOE will be providing billions of dollars in funding for updated energy code adoption and implementation, which should aid both the enforcement community and building industry. The Inflation Reduction Act specifically included \$1 billion for states – one third of this funding can go to states that meet or exceed the 2021 IECC, and two thirds can go to states

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<sup>2</sup> [https://www.energycodes.gov/sites/default/files/2021-07/NebraskaResidentialCostEffectiveness\\_2021\\_0.pdf](https://www.energycodes.gov/sites/default/files/2021-07/NebraskaResidentialCostEffectiveness_2021_0.pdf)

<sup>3</sup> [https://www.energycodes.gov/sites/default/files/2021-07/NebraskaResidentialCostEffectiveness\\_2021\\_0.pdf](https://www.energycodes.gov/sites/default/files/2021-07/NebraskaResidentialCostEffectiveness_2021_0.pdf)

<sup>4</sup> <https://www.aceee.org/files/proceedings/2014/data/papers/1-439.pdf>

<sup>5</sup> <https://www.aceee.org/sites/default/files/publications/researchreports/u1809.pdf>

<sup>6</sup> [https://www.energycodes.gov/sites/default/files/2021-07/NebraskaResidentialCostEffectiveness\\_2021\\_0.pdf](https://www.energycodes.gov/sites/default/files/2021-07/NebraskaResidentialCostEffectiveness_2021_0.pdf)



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that require net-zero homes – to assist with building energy codes. There will also be additional funding available to train the workforce in energy efficiency technologies and methods.

Nebraska's move to the unweakened 2018 IECC proved the state to be a leader in demonstrating the economic and societal benefits of a more efficiently built environment. To continue to showcase the state's commitment to energy efficiency and the benefits to Nebraskans, Nebraska should now take the necessary steps to adopt the unweakened provisions of the 2021 IECC. Adopting the 2021 IECC without weakening amendments will reduce energy use and costs for Nebraska residents and business owners, create more comfortable and healthier indoor environments, and result in more efficient and resilient buildings.

If you have any questions or need more information, please contact Corie Anderson, Senior Building Policy Associate at MEEA, at [canderson@mwalliance.org](mailto:canderson@mwalliance.org) or 312-784-7243. Thank you for your time and consideration.

Sincerely,

Stacey Paradis  
Executive Director