

March 15, 2024

Illinois House Energy & Environment Committee
401 South Second Street, Room 114
Springfield, Illinois 62701

Re: MEEA's comments on redefining the term "code" within the Energy Efficient Building Act

Dear Chairwoman Williams and Members of the Energy & Environment Committee,

Thank you for the opportunity to provide comments on the proposed redefining of the term "code" 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. MEEA has experience supporting states and municipalities across the region as they develop building energy policies and implement codes programs and trainings.

MEEA supports Illinois' current process of adopting "the latest published edition of the International Code Council's International Energy Conservation Code" (IECC) within one year of its publication, as directed by Sections 10 and 20 of the Act.¹ This process, which has been statutorily required in the state since 2007, is the best practice for improving energy efficiency in buildings.

Redefining the term "code" within the Act to mean the 2021 IECC (or any one version of the IECC), and thereby abolishing the state's automatic update of energy efficiency standards, would lead to less affordable homes for people to live in, an undertrained and inexperienced statewide workforce, and stalled progress towards Illinois' sustainability and climate goals.

1. Stronger building energy codes will bring Illinois closer to its savings and climate goals

The state has an overarching goal to reduce carbon emissions to zero by 2050 and, through the passage of the Climate and Equitable Jobs Act (CEJA), has set additional incremental goals regarding energy efficiency to help meet that deadline. Examples of these include the creation and adoption of stretch energy codes for residential and commercial buildings and the expansion of low-income weatherization programs. If Illinois wants to make legitimate progress towards its climate and sustainability goals, it is imperative to continue adopting and implementing strong energy efficiency code standards.

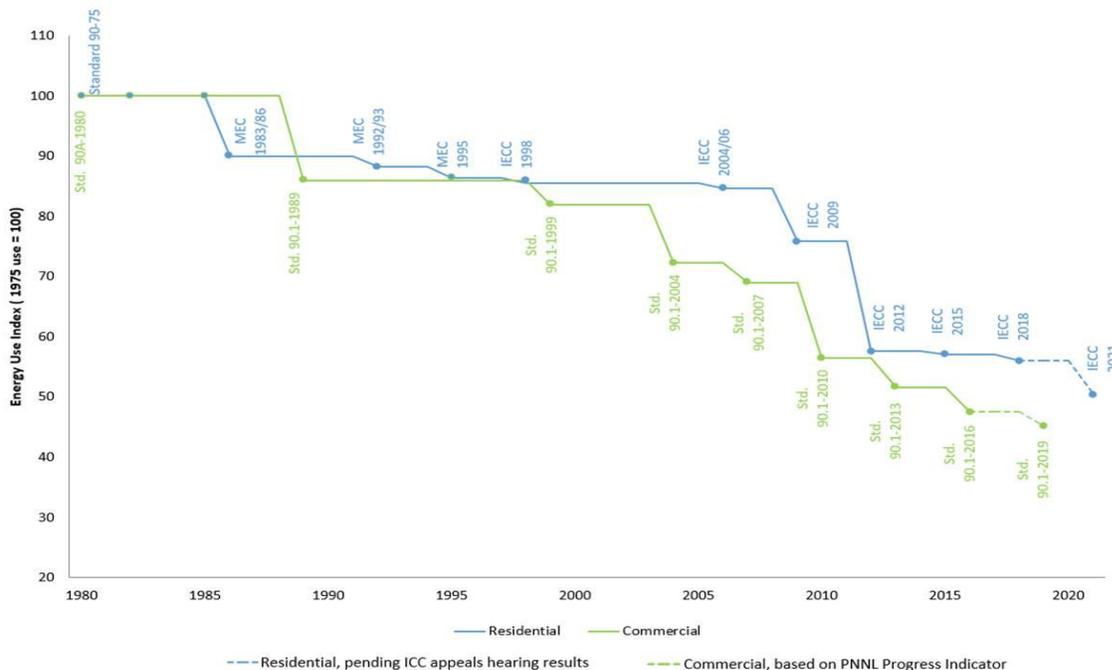
It is important for the Committee to recognize the importance of staying up to date on the energy codes published by the International Code Council (ICC). The ICC updates the code every three years, and the 2024 version is set to be published in the Spring of this year. This cycle is purposeful as it provides states with consistent, incremental steps to adopt and implement with ease – each new code standard is a steppingstone towards the next.

Moreover, building energy codes become more efficient and cost-effective with each new version that is developed. Indeed, the U.S. Department of Energy (DOE) is required by law² to issue a determination as to whether the latest version of the IECC will improve energy efficiency compared to the previous edition of the corresponding standard or code. For example, DOE

¹ 20 ILCS 3125

² Energy Conservation and Production Act, as amended (42 U.S.C. 6831 *et seq.*)

found that the 2021 IECC improved efficiency by 9.4% and reduced greenhouse gases (GHG) by 8.7% over the 2018 IECC.³ Those improvements save homeowners an average of \$2,320 over the life of a typical mortgage.⁴



Model Energy Codes Efficiency Updates. Source: ACEEE, Data from Pacific Northwest National Laboratory & U.S. DOE Building Codes Program

That being said, it is crucial for Illinois to continue regularly updating its energy code standards if it wants to get the most “bang for its buck.” Failing to do so only diminishes all the economic and sustainability benefits that strong codes have to offer.

2. Stronger energy efficiency code standards are the most cost-effective way to ensure lower utility bills.

Energy efficiency simply means using less energy to get the same job done. By lowering energy use, energy efficiency also reduces monthly energy bills and makes energy more affordable. The easiest and most cost-effective time to make energy efficiency improvements is during initial construction, making the baseline energy code a significant driver of energy cost savings in the state.

The continued adoption of the latest published edition of the IECC presents a cost-effective way to reduce the energy consumption of homes in Illinois and save residents money. In fact, the ICC assesses cost-effectiveness when it updates each model energy code, and each development is intended to be a steady, incremental change for the building industry. However, by arbitrarily

³ See U.S. DOE’s Determination of Efficiency (<https://www.energycodes.gov/determinations>)

⁴ See ICC’s Reasons for Adopting the 2021 IECC (<https://www.iccsafe.org/products-and-services/iecc-on-a-mission-toolkit/>)

locking the state into the 2021 IECC for the foreseeable future (while standards continue to progress), that cost-effectiveness cannot be achieved, and Illinois' citizens and building industry will suffer for it.

Buildings have long-term impacts beyond their initial construction costs, and energy codes play a crucial role in providing monetary payback to owners and renters. The continued adoption of each updated version of the IECC can significantly reduce energy consumption and lower utility costs for residents and businesses.

3. Stronger building energy codes effect the lifetime of a building – not just its initial construction

Another key point for the Committee to consider is that 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. The state must give as much consideration to building owners and occupants as it gives to builders. After all, owners and occupants are the ones who suffer the consequences of inefficient homes through higher energy bills, increased maintenance costs and poorer indoor air quality. However, if buildings are constructed as efficiently as possible, owners and occupants will see the direct benefits for years to come.

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

Assistance may include educative resources, targeted training, incentives and rebates, and plan review assistance. Each of these strategies will continue to help jurisdictions and their citizens better understand the codes and implement them successfully. With this assistance, in addition to state-created resources, designers and builders can feel confident they will not be left to fend for themselves.

5. Stronger codes provide an opportunity for designers and builders to learn and utilize new construction techniques and technologies.

Newer building energy codes leverage the latest building science and technology while providing various building professionals with valuable learning opportunities. This technical assistance may include 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, or compliance resources and software tools (like COMcheck and REScheck).

If Illinois stays up to date with the ICC's model energy codes, there are more available resources to educate local designers, builders, building operators and code officials (among others) about how to properly comply. MEEA itself offers training sessions and webinars to building professionals, municipalities, states, utility companies and others. Once these entities learn how to properly use the newest building techniques and technologies, they start to realize significant cost savings as well. MEEA's energy code trainings have improved compliance in Illinois, Kentucky, Missouri and Nebraska.

By adopting and implementing the most up-to-date editions of the IECC, Illinois will see increased economic development and technical innovation within the construction industry. However, if the state fails to update its energy code, the result will be an undertrained workforce that falls behind neighboring jurisdictions and an out-of-date building stock that wastes energy and money.



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The continual adoption of the latest published edition of the IECC is a cost-effective way to gradually increase the level of efficiency of residential and commercial buildings over time. The model energy codes will reduce long-term energy use and costs for residents and businesses, advance Illinois' workforce and economy and ensure that Illinois stays on course to accomplish its climate goals on time.

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, Executive Director