

May 10, 2023

Regina Hanshaw
Ohio Board of Building Standards
6606 Tussing Rd
Reynoldsburg, OH 43068

RE: MEEA Comments Supporting the Adoption of the Unweakened 2021 IECC

Dear Ms. Hanshaw and Members of the Board of Building Standards,

Thank you for the opportunity to comment on Ohio's building code update. 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 done work in Ohio related to energy codes in the past and has provided technical assistance to the Ohio Board of Building Standards during previous energy code adoption cycles.

MEEA strongly recommends the adoption of the 2021 International Energy Conservation Code (IECC) **without** weakening amendments for residential and commercial buildings in Ohio. We urge the Board to adopt the unamended 2021 IECC to ensure the people of Ohio receive the wide-ranging benefits of improved building efficiency and to allow the state to access robust federal funding opportunities in the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA).

In addition, adopting the full 2021 IECC will provide the following benefits:

- Energy use and utility bill reduction for residents and businesses
- Promotion of new, local clean energy jobs
- Increased comfort and improved indoor air quality
- Increased grid reliability and resilience, allowing residents to shelter in place longer during extreme weather events and/or power outages
- Improved building infrastructure for generations to come
- Cost savings by installing efficiency measures at the time of initial construction, rather than retrofitting existing buildings
- Staying up to date with the most current model code and, thereby, staying up to date on improved building practices and technologies

The Unweakened¹ 2021 IECC will Save Energy and Money for Ohio Residents and Businesses

Buildings account for roughly 40% of all energy used and over 70% of all electricity used in the United States. Updated building energy codes have consistently shown to be the most cost-effective way to reduce that energy consumption – putting significant monetary savings back into pockets of building owners, businesses and residents. The U.S. Department of Energy (DOE) conducts state-specific energy savings and cost-effectiveness analyses for each new model commercial energy code. According to this research, updating Ohio's residential code from the 2015 IECC with weakening amendments to the unweakened 2021 IECC would result in statewide

¹ "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.

energy savings of 12% and around \$260 of annual utility bill savings for the average Ohio household.²

Strong Energy Codes Make Ohio's Buildings Safer

The adoption of the 2021 IECC would lead to more energy efficient buildings in Ohio and, consequently, result in the construction of safer, more resilient buildings. Improving Ohio's resiliency and preparedness against emergencies such as blizzards, floods, heatwaves and power outages will bring obvious benefits to communities across the state, including increased safety, greater ability to comfortably shelter in place longer and improved health outcomes.³ Updating energy codes can also significantly reduce the stress on the grid and improve reliability by reducing the demand from buildings. This is critical during times of extreme weather, when energy resources from the grid can be strained. The most cost-effective time to prevent future damage from extreme weather is during initial building construction, and Ohio has an opportunity for long-term resiliency planning with the adoption of the unweakened 2021 IECC.

The Unweakened 2021 IECC Supports Job Creation in Ohio

In 2021, the clean energy sector supported more than 110,00 jobs in Ohio, of which 68% were in energy efficiency.⁴ All energy efficiency jobs are interdependent with the building industry, whether it be through HVAC, insulation or lighting. These are good, in-state jobs in a vital, growing sector of Ohio's economy. Updating the state's energy code to the unweakened 2021 IECC will result in the creation of over 680 jobs in the first year and 17,600 over the next 30 years.⁵ By updating the state's energy code to the 2021 IECC, Ohio has an opportunity to build on its strong foundation and continue to spur local construction and manufacturing jobs in the state.

Updated Energy Codes Provide Benefits to the Building Industry

The model codes are designed to *incrementally* increase efficiency standards, minimizing "big leaps" in requirements. By not staying up to date with the model codes, it becomes easier for jurisdictions to fall devastatingly behind, particularly in the workforce, as builders, contractors, architects, etc. will not be trained or well-versed on the newest building practices and technologies, and it will only get harder for them to learn as those practices and technologies continue to evolve. Therefore, MEEA recommends that Ohio adopt the most up-to-date model code (the *full* 2021 IECC), which is developed through a rigorous stakeholder engagement process made up of multiple industries.

Increased cost can be a point of concern with energy code adoption processes. It is important to remember that the building industry touches a home once – at the time of construction – but the residents who live in that home for decades will feel the impact of its construction practices for much longer. It is also much more cost-effective to include energy efficiency improvements at the time of initial construction than during subsequent renovations. The energy code is considered the floor – the least efficient building that can be constructed by law – and builders who are only building to the bare minimum may see a slight cost increase. However, for builders already building "better than code," there should be little to no actual increase in cost to meet an updated energy code.

² https://www.energycodes.gov/sites/default/files/2021-07/OhioResidentialCostEffectiveness_2021.pdf

³ <https://www.energycodes.gov/energy-resilience>

⁴ <https://www.cleanjobsmidwest.com/state/ohio>

⁵ https://www.energycodes.gov/sites/default/files/2021-07/OhioResidentialCostEffectiveness_2021.pdf

The 2021 IECC will Allow Ohio to Access Federal Funding

The United States federal government will provide billions of dollars in funding for updated energy code adoption and implementation, which should aid both the code enforcement community and building industry. Specifically, the Inflation Reduction Act will provide states with \$1 billion in energy codes funding opportunities.⁶ One third of this funding can go to states that meet or exceed the 2021 IECC and two thirds can go to states that require net-zero homes. There will also be additional funding available to train the workforce in energy efficiency technologies and methods. By updating to the 2021 IECC without weakening amendments, Ohio will be poised to apply for and receive this funding.

The 2021 IECC includes achievable, cost-effective standards that many states and municipalities across the Midwest have already adopted. The adoption of the unamended 2021 IECC would result in energy efficient buildings that are more affordable to operate and maintain for years to come in Ohio. However, the full value of the energy and cost savings, and other benefits associated with updating to the 2021 IECC, will be substantially reduced if weakening amendments are adopted in the final Ohio Building Code. The adoption of the unweakened 2021 IECC will reduce the cost of utility bills for residents, businesses and building owners, create more comfortable and healthier indoor environments and improve the resilience of buildings in the state. Adopting the newest and strongest building standards will ensure long-lasting benefits for all Ohioans.

If you have any additional questions, please contact MEEA's Senior Building Policy Associate, Corie Anderson at canderson@mwalliance.org. Thank you for your time and consideration.

Sincerely,



William Angelos
Interim Executive Director

⁶ <https://www.whitehouse.gov/wp-content/uploads/2022/12/Inflation-Reduction-Act-Guidebook.pdf>, page 113