

International Energy Conservation Code (IECC)

Project Engagement

VIEWS	PARTICIPANTS
1,158	44
RESPONSES	COMMENTS
0	153
SUBSCRIBERS	
37	

Commercial - IECC

1. In C408.2 and C408.3.1 & ASHRAE 4.2.5.1, does a ASHRAE certified BCxP in good standing qualify to perform commissioning?

It appears that would meet ASHRAE's definition of a "commissioning provider"

Being a design professional doesn't really qualify a person to oversee commissioning.

It would be good to harmonize those, ASHRAE appears to be the better reading, and bring over the definitions of COMMISSIONING, COMMISSIONING PROVIDER, VERIFICATION AND TESTING PROVIDER, and FUNCTIONAL PERFORMANCE TESTING.

2. Has there been consideration of limiting how poor of envelope can be offset using C407? (Fail envelope ComCheck by no more than 10%)

3.a. Harmonize IECC with ASHRAE §5.9 requiring Envelope commissioning.

b. Does a University of Wisconsin-Madison certified BECxP meet the requirement of for envelope commissioning

21 days ago

It is proposed for the 2021 COA Energy Code that commissioning as it appears in the published code be accepted for Austin. Austin did lead the way about ten years ago in instituting a commissioning requirement which included some fairly extensive qualifications, but now that the IECC has closed the gap and because management has emphasized simplifying all the codes, the national language has been deemed acceptable. With that, section C408.2 requires that a "registered design professional" or "approved agency" perform the commissioning tasks. Under 4.2.5.2, ASHRAE 90.1-2019 requires that a "commissioning provider" perform the work of commissioning. Both definitions are equally vague and will remain so until commissioning agents can come together and agree on which certifications should be recognized and which shouldn't. Because of these dynamics, it's believed that accepting the nationally vetted language is the best course of action for Austin. Certification as a BCxP does qualify as meeting the definitions contained in both the IECC and ASHRAE. Modifications to section C407 have not been proposed and while envelope commissioning does appear to be part of 90.1-2019, those requirements amount to inspections which are already supposed to be performed. C402.5.2 though does contain some envelope testing requirements that we're hoping for clarity from ICC on in its forthcoming commentary. And thank you for the comment!

21 days ago

I'm writing to ask that you include "Solar Ready", "Electric Vehicle Ready" and "Storage Ready" amendments to the commercial International Energy Conservation Code (IECC). The 2021 IECC is a good step forward, but it will be even better with these additions. Austin should adopt these codes that make it easy and affordable for future commercial buildings to reduce their emissions by generating on-site power through solar and storage systems. As the electrification of transportation becomes a reality, EV-ready buildings will be able to install EV chargers to charge the increasing amount of EVs on the roads in Austin. Solar energy and storage can directly charge these vehicles without putting additional constraints on the grid.

We should do everything possible to make it easier for people to use renewable energy, and these three additions achieve that. By not including these additions, buildings will need to be retrofitted resulting in excessive extra costs.

Buildings constructed today will be around for decades, so it's important that we start building in a way that mitigates climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate solar systems, electric vehicles, and energy storage.

All of these options leave builders and property owners with full choice to select whichever technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.

Thank you for your time. I would like to stay informed as the Austin IECC update continues.

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Thank you very much for this comment. It is widely agreed that all of these points are accurate however, recent action by the governing body which oversees the IECC (confusingly, ICC or the International Code Council) has clarified that the IECC is not the place for measures such as solar, EV, or storage ready because they do not improve the energy efficiency of a building.

21 days ago

a t u g j u g v

Dear City of Austin and Austin Energy,

The Lone Star Chapter of the Sierra Club is in full support of the proposed changes to the 2021 IECC Commercial provisions. We are pleased that the great work the City of Austin has done through the years on commissioning has been incorporated into the 2021 IECC and we appreciate that you will continue to require local amendments on cool roofs and demand response capabilities such as water heaters. We believe these have proved useful during peak energy use to keep the lights on and keep energy costs low.

While we support all of the proposed amendments and changes, we would note some additions that we believe should be considered. First, we do not see the solar-ready provisions that were adopted by the City a few years ago. If these are in a different code do let us know but we were disappointed not to see the language as part of the energy code.

Second, we believe that the City of Austin is losing an opportunity by not adding some Electrification-Ready and in particular EV-ready provisions. While we do not believe that the City of Austin should or can require all new buildings to have all electric appliances or be ready to plug in EVs, we do believe that Austin should require some electric appliance ready and EV-ready provisions. Much of this language existed as proposed amendments to the 2021 codes, and some cities like Denver, Boulder and Atlanta have already adopted EV-Ready provisions for certain building types. Separately we will be submitting some recommendations on incorporating this language into our codes.

22 days ago

Thank you for the kind words! Solar ready was approved in 2017 for the City of Austin through a stand-alone ordinance (ordinance 20170615-100). No substantive changes have been proposed to it, certainly not its deletion. Insofar as solar, EV, and storage ready are concerned, recent action by the governing body which oversees the IECC (confusingly, ICC or the International Code Council) has clarified that the IECC is not an appropriate home for measures such these because they do not improve the energy efficiency of a building.

21 days ago

ERI Ratings, Section 401.2.1: Texas Gas Service (TGS) proposes adding performance options to both the residential and commercial performance paths based upon current federal rating systems and tools that use source energy. For the residential coverage, we would recommend proposing a new section (R407) implementing the Home Energy Score, which uses source energy and numerical rating of residential buildings and suggest incorporating terms for a 15% or better performance rating over base line design. For commercial building coverage, we would recommend a new section as well (C409) referencing use of Energy Star for Commercial Buildings and using its stated performance threshold score of 75 or better over the median rated performance score for the building class of 50. The proposed metrics are better suited for the purpose of directly calculating potential emission reductions because they incorporate source energy emissions and thereby provide a more robust account of emission reduction efforts attributable to consumer energy choice.

HVAC Fault detection, Section C403.2.3: To ensure that true faults, including undercharging of refrigerant cycles are adequately captured, TGS proposes that criteria for "fault" status should be based in part upon operation of electric resistance heating above the technical balance point of electrical refrigeration (air conditioning and heat pumps) during heating cycles. Temperature-based balance point criteria for faults could also be used, although such criteria are going to be a combination of equipment and installation conditions and ambient temperatures.

Energy Monitoring, Section C405.12: TGS proposes a requirement that reported electrical monitoring include source energy consumption calculations using conversion factors relevant to Austin's electricity sources.

New section, portfolio manager tool: TGS proposes the addition of a new section, C409, to establish the Portfolio Manager Tool supported by energy star for commercial buildings as the energy performance requirement for commercial buildings. Including the Energy Star for Commercial Buildings performance criteria allows for a transparent and objective basis for energy performance analysis and documentation. The Portfolio Manager tool has been used to benchmark over 200,000 commercial building for energy performance, and over 12,600 commercial buildings have met the Energy Star for Commercial Buildings certification requirements of a rating of 75 or higher. This proposal would apply the Portfolio Manager tool to demonstrate performance without requiring an Energy Star for Commercial Buildings certification.

[New Section – C409] The proposed design shall meet the requirements of Energy Star for Commercial Buildings or rated performance of 75 or higher using Portfolio Manager supported by Energy Star for Commercial Buildings.

23 days ago

Thank you, only the commercial portion of the comment will be addressed here. Both Energy Star for Commercial Buildings and Portfolio Manager require billing data and thus the building to exist to verify compliance. This would not achieve the fundamental goal of plan review or inspections to verify compliance before a building is built. Neither of these programs were intended or developed as code compliance tools. On a broader level, the scope of the energy code is limited to the effective use of energy at the building level and thus does not encompass topics external to that such as a distinction between site and source energy.

HVAC fault detection and Energy Monitoring: Currently, neither the IECC nor ASHRAE 90.1 seek to define what constitutes a fault or to configure what information is displayed beyond the basics. This is left up to projects to decide and to coordinate with operations. What the code does seek to do is require that equipment to detect faults and monitor energy use be provided and that information be able to be appropriately communicated to personnel.

18 days ago

While I recognize this would be a new addition to the code, I would like to suggest Austin consider adding a requirement based on new addenda recently published for ASHRAE 90.1. In short, we suggest you consider 90.1-2019 as a new on-site renewable energy requirement. The published addenda may be downloaded from <https://www.ashrae.org/file%20library/technical%20resources/standards%20and%20guidelines/standards%20addenda/90.1-2019.pdf>. These new requirements were completed after publication of ASHRAE 90.1-2019, but are now available for consideration here.

I represent the National Glass Association and Aluminum Extruders Council, whom together have over 1800 members across North America. I am also co-vice-chair of the ASHRAE 90.1 committee. While I do not speak for the Association, I can provide further information on how the proposed changes relate to work done there.


Addendum BY is a prescriptive requirement to install a minimum amount of on-site renewable energy system. The primary requirement is in Section 10. This is a prescriptive requirement that may be traded off in Section 11. Addenda CK and CP adjust the baselines for the Section 11 Energy Cost Budget performance path and Appendix G, which is consistent with the prescriptive requirement.

This would apply to building types covered by ASHRAE 90.1 including all nonresidential as well as residential buildings. We choose to focus on just nonresidential if you so choose.

25 days ago

Thank you, these addenda are an exciting addition to the Standard. Generally, Austin does not incorporate approved addenda but prefers to adopt them as the Standard is published. This is to avoid the potential for confusion and possible coordination issues with other future addenda or codes. There are exceptions, such as when a clarification is necessary, or an error has been discovered.

Still, we're very much looking forward to this. So much so that we have questions about its content and hope that you'll be able to help. Please feel free to email me directly at Michael.husted@austinenergy.com so I can share with you what those questions are.


25 days ago 

Recommend local amendment to require whole building air leakage testing per ASTM E779 for all commercial buildings to verify code section C402.5.1 Air barriers. It is the only way to verify these requirements. The cost of performing this test, even on very large high-rise buildings is becoming quite affordable. There is precedent in other cities, such as Seattle, making this requirement with significantly improved building performance and culture.

25 days ago

Section C402.5.2 was intended to require envelope testing in what amounts to the residences in Group R2 commercial buildings. However, the way exception 3 to C402.5.1.2 is worded, there is some question as to whether this testing is actually required by the 2021 IECC or if projects can simply comply using the current methodology if they choose not to test. We're hoping for clarification from ICC on this in the forthcoming commentary.

This represents a significant but sensible step into envelope testing for commercial buildings. The technology and expertise is already in place to perform unguarded testing in low-rise multifamily buildings so it's logical to extend this to high-rise multifamily. Whether to extend this to all commercial properties raises questions about service availability and affordability that will be difficult to address at this late date without delaying the balance of the code significantly.

25 days ago 

Several changes to the amendments related to Commissioning (largely deletions), most reference the fact that Commissioning is now part of the published Code (which it is), but this document indicates that the entire IECC Code Section C408 (which is where Commissioning appears) is deleted. Clarification on exactly where designers need to look for the new code would be helpful. Or if the Commissioning requirement is going away altogether, that should be clarified.

one month ago

All this is administratively complicated but in order to amend a section, we first need to delete it and then add it back in its amended form. The proposal this cycle is to simply not delete section C408 from the published code which is why there's a local strikethrough to that current deletion. Hope this makes sense!

one month ago

With the new alignment of IECC with ASHRAE outlined in Section: C403.2.3, will designers now be able to "mix and match" energy compliance calculations (ComChecks), and if so, is that being codified (I did not see anything to this effect).

one month ago

No, that was removed back in 2012 (I think). There's an "or" in C401.2 that codifies this. Thanks!

one month ago

Residential - IECC

residential IECC comments,

I'm writing to ask that you include "Electric Vehicle Ready" and "Storage Ready" amendments to the commercial International Energy Conservation Code (IECC) and "Electric Vehicle Ready" and "Electric Readiness," to the residential IECC for Austin. The 2021 IECC is a good step forward, but it will be even better with these additions.

I also support the proposed removal of the requirement for new residential buildings constructed near a natural gas line to use gas for hot water heating. Builders should be free to choose clean, efficient electric water heating options.

Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers, electric appliances and energy storage. Retrofitting buildings that aren't constructed with wiring and space to accommodate these technologies results in excessive extra cost for building owners and occupants down the road. Because of that extra cost, it often results in a locking in fossil fuel use for decades. We should do everything possible to make it easier for people to utilize renewable energy to meet our energy needs at home, at work and on the road.

Buildings constructed now will be around for decades, so it's important that we start building in a way that will accommodate the changes that need to be made to mitigate climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances and energy storage.

All of these options leave builders and property owners with full choice to select whichever technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.


Thank you for your time. I would like to stay informed as the Austin IECC update continues.

Jillian Vazquez

j.vazquez@sunshinerenewable.com

1712 Timber Ridge Rd

Austin, Texas 78741

16 days ago 

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21 days ago

Dear Austin Energy Residential IECC comments,

 Thank you for the opportunity to comment on the draft International Energy Conservation Code (IECC) for Austin. I support the adoption of the 2021 IECC as an important step for achieving our climate goals and reducing energy costs.

I'm also glad to see that there will no longer be a requirement for new buildings constructed near a natural gas line to use the fossil fuel for hot water heating. Builders should be free to choose clean, efficient electric water heating options.

I would like the IECC code updates to include provisions that make it easy and affordable for future occupants of buildings to install electric vehicle chargers and electric appliances. Phasing out the use of fossil fuels for transportation and appliances in buildings is key to reducing greenhouse gas emissions. It will be cheaper and easier to make this transition if buildings are wired to accommodate these changes from the start.

Electric Vehicle Ready provisions should be included for both residential and commercial buildings. It is important that EV chargers be available in all types of housing and at businesses. EV adoption is increasing, but access to charging is still a significant barrier. Austin Energy's current resource mix makes electric vehicles the best option for reducing emissions from the transportation sector. These provisions will make that possible.
Draft Electric Vehicle Ready requirements for commercial buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P1.pdf>
Draft Electric Vehicle Ready requirements for residential buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P2.pdf>

Electric Readiness provisions should be required for residential buildings. The buildings constructed today will still be in use decades from now. Even if a builder or the first occupant of a building chooses natural gas appliances, it is highly likely that a future occupant will want electric appliances. Modern heat pumps make water and space heating more efficient and affordable with electricity, compared to natural gas. Providing wiring that allows future building occupants to easily swap out a natural gas appliance for an electric appliance will save money and allow for emissions reductions.
Draft Electric Readiness requirements for residential buildings: https://newbuildings.org/wp-content/uploads/2019/11/2019-Group-B-CAH-compressed_RE147.pdf

Thank you for considering my comments.

Sincerely,
 Matt Myers
51 Rainey St.
Austin, TX 78701

21 days ago 

The ICC ruled during the 2021 codes appeal process that codes related to EV and Electric-readiness are outside the current scope and intent of the energy provisions of the IECC. With the change in consensus process procedures by the ICC there has also come a change in scope for the IECC. Given the amount of support for further discussions on EV ready and electrification, Austin Energy is committed to having a robust community dialogue about options for pursuing those goals. There are a number of underlying drivers for adopting the 2021 code with minimal new amendments now and allowing time for careful consideration for the full range of potential options available for enabling our community to further transportation electrification and electric readiness. These include passage of the entire body of building codes and enacting them in unison to prevent confusion of the initiation dates of the various codes as well as to meet the requirements of the Building Code Effectiveness Grading Schedule from the Insurance Services Office. Once that additional discussion has taken place, an action plan for executing on those ideas can be undertaken. There is a recent precedent for mid-cycle evaluation and action on building and city codes demonstrated by adoption of the Solar Ready local amendment to the energy code which went through the stakeholder and Council approval process as a stand-alone item after adoption of the 2015 IECC by the City.

13 days ago 

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better with these additions. </p>

<p>I also SUPPORT the proposed removal of the requirement for new residential buildings constructed
near a natural gas line to use gas for hot water heating. Builders SHOULD be free to choose clean,
efficient electric water heating options.
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the building over its lifespan.</p>

<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Lisa Silguero
<br>lsilguero2001@gmail.com
<br>4404 E Oltorf St
<br>Austin, Texas 78741</p>

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21 days ago

Thank you for your comments. We apologize for the oversight in not including the solar-ready provisions. They were not included initially, since no amendment was being proposed. However, after revisiting the language, we saw they are directly tied to the 2015 IECC with Austin Amendments. To ensure the provisions are carried forward they will be included directly into the 2021 IECC with Austin Amendments. For residential this will be under Chapter 7 Residential Solar Ready.

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Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers, electric appliances and energy storage. Retrofitting buildings that aren't constructed with wiring and space to accommodate these technologies results in excessive extra cost for building owners and occupants down the road. Because of that extra cost, it often results in a locking in fossil fuel use for decades. We should do everything possible to make it easier for people to utilize renewable energy to meet our energy needs at home, at work and on the road. </p>

<p>Buildings constructed now will be around for decades, so it's important that we start building in a way that will accommodate the changes that need to be made to mitigate climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances and energy storage.

All of these options leave builders and property owners with full choice to select whichever technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.</p>

<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Amy Concilio

amyconcilio@gmail.com

1400 Willow St

Austin, Texas 78702</p>

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13 days ago 

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I'm also glad to see that there will no longer be a requirement for new buildings constructed near a natural gas line to use the fossil fuel for hot water heating. Builders should be free to choose clean, efficient electric water heating options.


I would like the IECC code updates to include provisions that make it easy and affordable for future occupants of buildings to install electric vehicle chargers and electric appliances. Phasing out the use of fossil fuels for transportation and appliances in buildings is key to reducing greenhouse gas emissions. It will be cheaper and easier to make this transition if buildings are wired to accommodate these changes from the start.

Electric Vehicle Ready provisions should be included for both residential and commercial buildings. It is important that EV chargers be available in all types of housing and at businesses. EV adoption is increasing, but access to charging is still a significant barrier. Austin Energy's current resource mix makes electric vehicles the best option for reducing emissions from the transportation sector. These provisions will make that possible.
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Thank you for considering my comments.

Sincerely,
 Alexistori Gonzalez
PO Box 82 Highway 90
Boutte, LA 70039

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 <p>residential IECC comments,</p>
 <p>I am writing to ask you to include something very important in the revisions to the building code - plenty of wiring for the future when cars and appliances are electric.


When new buildings are being built is the most efficient time to plan for the future. </p>
 <p>Just ask me as the owner of a 50+ year old house. I am also the owner of an electric car and know the importance of being able to charge at my residence. I also just switched out my gas dryer for an electric appliance, which meant hiring an electrician to rewire the laundry room. It would be wise to require these future-focused requirements in the code NOW!</p>
 <p>Suzanne Bryant

suzbryant@gmail.com

1500 W 24th

AUSTIN, Texas 78703</p>
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<p>Helen Brauner


helen.brauner@gmail.com

8513 Honeysuckle trl


Austin, Texas 78759</p>

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<p>J Hill

hilljm2002@yahoo.com

4311 Shoalwood

Austin, Texas 78756</p>

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<p>Martha Rogers


rogers33@swbell.net

4104 Deepwoods dr

Austin, Texas 78731</p>


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<p>Electric Readiness provisions should be required for residential buildings. The buildings constructed today will still be in use decades from now. Even if a builder or the first occupant of a building chooses natural gas appliances, it is highly likely that a future occupant will want electric appliances. Modern heat pumps make water and space heating more efficient and affordable with electricity, compared to natural gas. Providing wiring that allows future building occupants to easily swap out a natural gas appliance for an electric appliance will save money and allow for emissions reductions.

Draft Electric Readiness requirements for residential buildings: https://newbuildings.org/wp-content/uploads/2019/11/2019-Group-B-CAH-compressed_RE147.pdf </p>

<p>Thank you for considering my comments. Please keep me informed as the code update process continues. </p>

<p>Kitty Coley

kitty@kittycoley.com

1725 Glenclyff Drive


Austin, Texas 78704</p>

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<p>Mitchell Hanna

hmitchell@solarunitedneighbors.org

5209 Tower Trail

Austin, Texas 78723</p>

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Expansion of radius around overhead lines is excessive, should remain the same at 12'. What is the health and safety reason for this change? If only for OSHA, OSHA regs are for active work sites that do not occur along the entirety of a line all at once. The proposed change is the equivalent of having a permanent job site along the entire line forever, which is simply not the case. The effect of the proposed change is to extend what is effectively an electric easement further into existing properties, limiting their use and reducing the capacity for additional housing units or enlarging existing housing to fit a family. The impact of this is significant on urban properties, where trees and other regulations also limit use. OSHA seems like a justification or excuse to expand easements more than a valid health and safety concern. There are urban areas across the state and country that do not require the proposed clearances and which are maintained using adequate safety measures today.

22 days ago

Thank you for your comment. This stakeholder engagement was to solicit comments regarding the adoption of the 2021 International Energy Conservation Code with Austin Amendments. However, we do value your feedback and I am more than happy to forward your comments to the correct group.

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Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

Carmaleta Williams

carmaleta24@sbcglobal.net

1923 Pachea Trail

Round Rock, Texas 78665</p>

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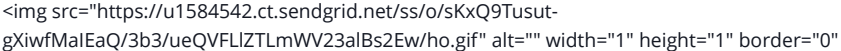
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<p>Frank Netscher

fnetscher@gmail.com</p>

<p>Austin, Texas 78702</p>

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<p>Jacob Rodriguez


jacob.rodriguez@utexas.edu

3506 Speedway, Apt 305

Austin, Texas 78705</p>


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<p>I'm writing to ask that you include "Electric Vehicle Ready" and "Storage Ready" amendments to the commercial International Energy Conservation Code (IECC) and "Electric Vehicle Ready" and "Electric Readiness," to the residential IECC for Austin. The 2021 IECC is a good step forward, but it will be even better with these additions. </p>

<p>I also support the proposed removal of the requirement for new residential buildings constructed near a natural gas line to use gas for hot water heating. Builders should be free to choose clean, efficient electric water heating options.

Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers, electric appliances and energy storage. Retrofitting buildings that aren't constructed with wiring and space to accommodate these technologies results in excessive extra cost for building owners and occupants down the road. Because of that extra cost, it often results in a locking in fossil fuel use for decades. We should do everything possible to make it easier for people to utilize renewable energy to meet our energy needs at home, at work and on the road. </p>

<p>Buildings constructed now will be around for decades, so it's important that we start building in a way that will accommodate the changes that need to be made to mitigate climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances and energy storage.

All of these options leave builders and property owners with full choice to select whichever technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.</p>

<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Carolyn Croom

cbcroom@sbcglobal.net

2502 Albata Ave.


Austin, Texas 78757</p>

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<p>We have no time to lose if we are going to become carbon neutral and avoid the worst effects of global warming. I'm writing to ask that you include "Electric Vehicle Ready" and "Storage Ready" amendments to the commercial International Energy Conservation Code (IECC) and "Electric Vehicle Ready" and "Electric Readiness," to the residential IECC for Austin. The 2021 IECC is a good step forward, but it will be even better with these additions. </p>

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<p>Buildings constructed now will be around for decades, so it's important that we start building in a way that will accommodate the changes that need to be made to mitigate climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances and energy storage.

All of these options leave builders and property owners with full choice to select whichever technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.</p>

<p>Thank you for your time and appreciation of the urgency of this matter. I would like to stay informed as the Austin IECC update continues. </p>

<p>Caleb Queern

cqueern@gmail.com</p>

<p>round rock, Texas 78681</p>

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<p>I strongly urge you to include "electric vehicle-ready" and "storage-ready" amendments to the commercial International Energy Conservation Code (IECC), as well as "electric vehicle readiness" and "electric readiness" to the residential IECC for Austin. The 2021 IECC heads in the right direction, but we need to think seriously about what is needed in the near future. These recommended additions would accomplish that. </p>

I also support the proposed removal of the requirement for new residential buildings constructed near a natural gas line to use gas for hot water heating. Builders should be free to choose clean, efficient electric water heating options.

Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers, electric appliances and energy storage. Retrofitting buildings that aren't constructed with wiring and space to accommodate these technologies results in excessive extra cost for building owners and occupants down the road. Because of that extra cost, it often results in a locking in fossil fuel use for decades. We should do everything possible to make it easier for people to utilize renewable energy to meet our energy needs at home, at work and on the road. </p>

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Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

William Ross Pumfrey

rosspumfrey@gmail.com

8716 Towana Trail

Austin, Texas 78736-3312</p>

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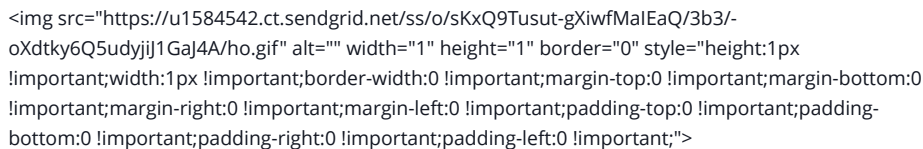
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<p>residential IECC comments,</p>

<p>Thank you for the opportunity to comment on the draft International Energy Conservation Code (IECC) for Austin. I support the adoption of the 2021 IECC as an important step for achieving our climate goals and reducing energy costs. </p>

<p>I'm also glad to see that there will no longer be a requirement for new buildings constructed near a natural gas line to use the fossil fuel for hot water heating. Builders should be free to choose clean, efficient electric water heating options. </p>

<p>I would like the IECC code updates to include provisions that make it easy and affordable for future occupants of buildings to install electric vehicle chargers and electric appliances. Phasing out the use of fossil fuels for transportation and appliances in buildings is key to reducing greenhouse gas emissions. It will be cheaper and easier to make this transition if buildings are wired to accommodate these changes from the start. </p>

<p>Electric Vehicle Ready provisions should be included for both residential and commercial buildings. It is important that EV chargers be available in all types of housing and at businesses. EV adoption is increasing, but access to charging is still a significant barrier. Austin Energy's current resource mix makes electric vehicles the best option for reducing emissions from the transportation sector. These provisions will make that possible.

Draft Electric Vehicle Ready requirements for commercial buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P1.pdf>

Draft Electric Vehicle Ready requirements for residential buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P2.pdf> </p>

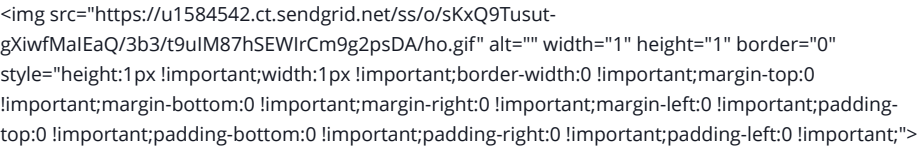
<p>Electric Readiness provisions should be required for residential buildings. The buildings constructed today will still be in use decades from now. Even if a builder or the first occupant of a building chooses natural gas appliances, it is highly likely that a future occupant will want electric appliances. Modern heat pumps make water and space heating more efficient and affordable with electricity, compared to natural gas. Providing wiring that allows future building occupants to easily swap out a natural gas appliance for an electric appliance will save money and allow for emissions reductions.

Draft Electric Readiness requirements for residential buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P2.pdf>

content/uploads/2019/11/2019-Group-B-CAH-compressed_RE147.pdf

Thank you for considering my comments. Please keep me informed as the code update process continues.

Ana Lois-Borzi
loisborzi@gmail.com
9418 El Rey Blvd
Austin, Texas 78737



22 days ago

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<p>I'm writing to ask that you include "Electric Vehicle Ready" in the commercial International Energy Conservation Code (IECC) and "Electric Vehicle Ready" and "Electric Readiness," to the residential IECC for Austin.</p>

<p>All the world's big automakers have pledged electrification of their product line by mid-century. Many will have predominantly electric vehicles in their product line before the end of the decade. Homes being built now should support or be readily adaptable to supporting electric vehicles. The 2021 IECC is a good step forward, but it will be even better with these additions. </p>

<p>I also support the proposed removal of the requirement for new residential buildings constructed near a natural gas line to use gas for hot water heating. Builders should be free to choose clean, efficient electric water heating options. On-demand as needed in-line water heaters are quite likely the optimal choice for many buyers and they should not be forced to use gas tank water heaters.</p>

<p>Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers and electric appliances. Retrofitting buildings that are not constructed with wiring to accommodate these technologies results in excessive extra cost for building owners and occupants down the road. This becomes a deterrent to further electrification and making it easy for people to utilize renewable energy.</p>

<p>I am not a fan of a lot of extra costs for local storage. I feel people should be able to use the batteries in their cars for emergency storage. There for the infrastructure wiring to support vehicle-to-grid (V2G) connection is a higher priority. This will be useful when extreme weather conditions cause blackouts (e.g., like this last February). V2G can provide emergency power for refrigerators and communication needs. If the home is fully electrified cooking and hot water can also be provided. Consumers are going to want to use their car batteries before they invest more for home-local storage.</p>

<p>The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances, and energy storage.

Standards should be set that leave builders and property owners with full choice to select whichever technologies they wish to use. We need to build now support the electrification evolution and lifespan of the home.</p>

<p>Regards,

David Hogan</p>

<p>David Hogan

david.hogan@ieee.org

5305 Valburn Circle

Austin, Texas 78731-1144</p>

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<p>Buildings constructed now will be around for decades, so it's important that we start building in a way that will accommodate the changes that need to be made to mitigate climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances and energy storage.

These measures would help Austin do its part to combat climate change. I would like to stay informed as the Austin IECC update continues. </p>

<p>Susan Pantell

sepantell@gmail.com

1016 Camino La Costa, #1008

Austin, Texas 78752</p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>
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<p>Jay Thomas


thomajay@gmail.com

5800 Levenwood Ln

Austin, Texas 78724</p>

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13 days ago 

Dear City of Austin and Austin Energy,

The Lone Star Chapter of the Sierra Club is very supportive of the proposed changes to the 2021 IECC Code for residential construction. We appreciate both the adoption of the underlying code as well as the local amendments which continue to make the City of Austin a leader on energy efficient building stock. We very much support the required demand response elements for water heaters, the removal of reference to gas water heating requirements which was duplicative, and the careful compromise on the use of ERI. As we understand it, builders could utilize an ERI path but would need to reach a number of 59, would need to meet a backstop of the 2015 IECC for building envelope and could only use onsite renewable for 5 percent of the total score. These seems like a good compromise to encourage the use of onsite renewable energy, but also to ensure that buildings are not built that are not energy efficient.

Dear City of Austin and Austin Energy,

The Lone Star Chapter of the Sierra Club is in full support of the proposed changes to the 2021 IECC Commercial provisions. We are pleased that the great work the City of Austin has done through the years on commissioning has been incorporated into the 2021 IECC and we appreciate that you will continue to require local amendments on cool roofs and demand response capabilities such as water heaters. We believe these have proved useful during peak energy use to keep the lights on and keep energy costs low.

While we support all of the proposed amendments and changes, we would note some additions that we believe should be considered. First, we do not see the solar-ready provisions that were adopted by the City a few years ago. If these are in a different code do let us know but we were disappointed not to see the language as part of the energy code.

Second, we believe that the City of Austin is losing an opportunity by not adding some Electrification-Ready and in particular EV-ready provisions. While we do not believe that the City of Austin should or can require all new buildings to have all electric appliances or be ready to plug in EVs, we do believe that Austin should require some electric appliance ready and EV-ready provisions. Much of this language existed as proposed amendments to the 2021 codes, and some cities like Denver, Boulder and Atlanta have already adopted EV-Ready provisions for certain building types. Separately we will be submitting some recommendations on incorporating this language into our codes. We believe there is a way to require EV-Ready and Electrification-ready provisions that are cost effective and will lead to more widespread use of electric products and EVs as Austin transitions to the future.

22 days ago

Thank you for your generous words and comments. We apologize for the oversight in not including the solar-ready provisions. They were not included initially, since no amendment was being proposed. However, after revisiting the language, we saw they are directly tied to the 2015 IECC with Austin Amendments. To ensure the provisions are carried forward they will be included directly into the 2021 IECC with Austin Amendments. For residential this will be under Chapter 7 Residential Solar Ready.

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22 days ago

Thank you for the kind words! Solar ready was approved in 2017 for the City of Austin through a stand-alone ordinance (ordinance 20170615-100). No substantive changes have been proposed to it, certainly not its deletion. Insofar as solar, EV, and storage ready are concerned, recent action by the governing body which oversees the IECC (confusingly, ICC or the International Code Council) has clarified that the IECC is not an appropriate home for measures such these because they do not improve the energy efficiency of a building.

21 days ago

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Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

Jim Summers

jimsummers@austin.rr.com

8901 Chisholm Ln

Austin, Texas 78748</p>

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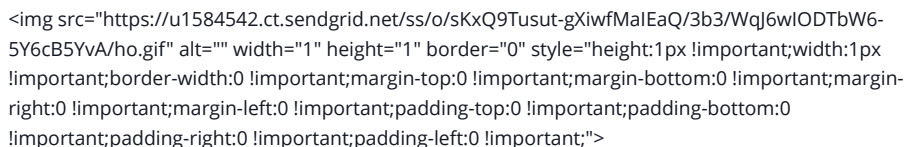
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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

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<p>Madeline Acri
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<br>madeline.acri@soligent.net
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<br>4115 e 12th street, UNIT 2
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<br>Austin, San Luis Potosi 78721</p>
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<br>My family moved into an older house a few years ago and now we're having to go through the pain and cost of updating the house to include a 220v outlet so we can get a tier 2 charger for our car. We're also scoping out the cost of working with an electrician to enable solar panels and add battery storage. Storm Uri made it clear Texas residents cannot count on the electrical grid to even function in an emergency and we must prepare ourselves because our infrastructure is an abject failure. I would like to see these changes made so future home buyers do not go through the same pains we are. </p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

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<p>Fred Benson
<br>bensonfredrick@gmail.com
<br>11510 oak knoll dr
<br>Austin, Texas 78759</p>

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<p>Sharon Gillespie


pretend@austin.rr.com

1103 Enfield Road


Austin, Texas 78703</p>

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<p>Mike Conti

professorconti@gmail.com

218 W 51st St A

Austin, Texas 78751</p>

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<p>pgottuso@gmail.com

1510 E 2ND ST

AUSTIN, Texas 78702</p>

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Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers.</p>

<p>Thank You,

Mike Saavedra

1717 Aggie Lane, 78757

(925) 639-8714</p>

<p>Michael Saavedra

mike@saavedramedia.com

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<p>Rye Seekins

samwise.neo@gmail.com

1906 Glenclyff drive

Austin , Texas 78704</p>

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<p>Bill Glass
<br>wlglass47@gmail.com
<br>408 Rivers Street


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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Linda Kniolek

lindakniolek@gmail.com

12716 Acadian Trail

Austin, Texas 78727</p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Kate Bomar

kbomar96@gmail.com

205 Attayac Street, Unit B

Austin, Texas 78702</p>

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<p>residential IECC comments,</p>

<p>Thank you for the opportunity to comment on the draft International Energy Conservation Code (IECC) for Austin. I support the adoption of the 2021 IECC as an important step for achieving our climate goals and reducing energy costs. </p>

<p>I'm also glad to see that there will no longer be a requirement for new buildings constructed near a natural gas line to use the fossil fuel for hot water heating. Builders should be free to choose clean, efficient electric water heating options. </p>

<p>I would like the IECC code updates to include provisions that make it easy and affordable for future occupants of buildings to install electric vehicle chargers and electric appliances. Phasing out the use of fossil fuels for transportation and appliances in buildings is key to reducing greenhouse gas emissions. It will be cheaper and easier to make this transition if buildings are wired to accommodate these changes from the start. </p>

<p>Electric Vehicle Ready provisions should be included for both residential and commercial buildings. It is important that EV chargers be available in all types of housing and at businesses. EV adoption is increasing, but access to charging is still a significant barrier. Austin Energy's current resource mix makes electric vehicles the best option for reducing emissions from the transportation sector. These provisions will make that possible.

Draft Electric Vehicle Ready requirements for commercial buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P1.pdf>

Draft Electric Vehicle Ready requirements for residential buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P2.pdf> </p>

<p>Electric Readiness provisions should be required for residential buildings. The buildings constructed today will still be in use decades from now. Even if a builder or the first occupant of a building chooses natural gas appliances, it is highly likely that a future occupant will want electric appliances. Modern heat pumps make water and space heating more efficient and affordable with electricity, compared to natural gas. Providing wiring that allows future building occupants to easily swap out a natural gas appliance for an electric appliance will save money and allow for emissions reductions.

Draft Electric Readiness requirements for residential buildings: https://newbuildings.org/wp-content/uploads/2019/11/2019-Group-B-CAH-compressed_RE147.pdf </p>

<p>Thank you for considering my comments. Please keep me informed as the code update process continues. </p>

<p>Colby Simpson

colbysimpson@gmail.com

1403 Bridgeway Dr APT B

AUSTIN, Texas 78704</p>

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<p>Jen Cregar

jcregar@gmail.com</p>

<p>Austin, Texas 78751</p>

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<p>residential IECC comments,</p>

<p>I can not claim to be anything close to an expert in home construction or the technical aspects of energy distribution.

 What I do know is that the faster we can stop using all fossil fuels, the better chance we have of avoiding the worst consequences of climate change. We must do everything possible to facilitate an easy transition to sustainable energy. Any upfront costs will be less than the damage caused by continued use and any costs to remediate what should have been prevented.</p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Bill King


billking53@gmail.com

4507 Shoal Creek Blvd

AUSTIN, Texas 78756</p>

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<p>Sharon Hartman
<br>sherryterry60@gmail.com
<br>9006 W. Pointer Ln.
<br>AUSTIN, Texas 78758</p>

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I also support the proposed removal of the requirement for new residential buildings constructed near a natural gas line to use gas for hot water heating. Builders should be free to choose clean, efficient electric water heating options.

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Buildings constructed now will be around for decades, so it's important that we start building in a way that will accommodate the changes that need to be made to mitigate climate change. The more we build right from the start, the less we will have to spend on retrofits to accommodate electric vehicles, electric appliances and energy storage.

All of these options leave builders and property owners with full choice to select whichever technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.

Thank you for your time. I would like to stay informed as the Austin IECC update continues.

Lesa Walker

lrwalker04@yahoo.com


Austin, Texas 78703

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22 days ago

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<p>residential IECC comments,</p>
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<p>I've lived in Austin for 8+ years now, and since the day I moved here, I've wanted to electrify as many components of my life as I can. However, cost has been an impediment to that in my life, as electrifying appliances can be quite costly in terms of the required electrical infrastructure.</p>
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<p>I'm writing to ask that you include "Electric Vehicle Ready" and "Storage Ready" amendments to the commercial International Energy Conservation Code (IECC) and "Electric Vehicle Ready" and "Electric Readiness," to the residential IECC for Austin. The 2021 IECC is a good step forward, but it will be even better with these additions. </p>
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<p>I also support the proposed removal of the requirement for new residential buildings constructed near a natural gas line to use gas for hot water heating. Builders should be free to choose clean, efficient electric water heating options.
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<br>Austin should adopt codes that make it easy and affordable for future occupants of buildings to install electric vehicle chargers, electric appliances and energy storage. Retrofitting buildings that aren't constructed with wiring and space to accommodate these technologies results in excessive extra cost for building owners and occupants down the road. Because of that extra cost, it often results in a locking in fossil fuel use for decades. We should do everything possible to make it easier for people to utilize renewable energy to meet our energy needs at home, at work and on the road. </p>
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<br>All of these options leave builders and property owners with full choice to select whichever
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...that all of these options leave owners and property owners that have chosen to select alternative technologies they wish to use, while respecting that they are likely not going to be the only occupants of the building over its lifespan.</p>

<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Noah Coburn


noahcoburn@gmail.com

860 Banister Lane


Austin, Texas 78704</p>

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<p>Please go a step further with the new building codes! Require electric vehicle charging stations and wiring for electric appliances! These measures will better prepare us to transition to more sustainable energy usage in the future! Thank you for the opportunity to comment on the draft International Energy Conservation Code (IECC) for Austin. I support the adoption of the 2021 IECC as an important step for achieving our climate goals and reducing energy costs. </p>

<p>I'm also glad to see that there will no longer be a requirement for new buildings constructed near a natural gas line to use the fossil fuel for hot water heating. Builders should be free to choose clean, efficient electric water heating options. </p>

<p>Electric Vehicle Ready provisions should be included for both residential and commercial buildings. It is important that EV chargers be available in all types of housing and at businesses.</p>

<p>Electric Readiness provisions should be required for residential buildings. </p>

<p>Thank you for considering my comments. Please keep me informed as the code update process continues. </p>

<p>Lynne Smith

carollynnesmith@hotmail.com

1006 east 13th st

Austin, Texas 78702</p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Maria Muskus

mjmuskusm@gmail.com

7201 Ranch Rd 2222 Apt 3115, Apt 3115


Austin, Baden-Württemberg 78730</p>

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<p>residential IECC comments,</p>

<p>I'm an Austin resident of a home built in 1984 but am considering an energy retrofit vs selling and moving into/building a new home. I'd like to find something that meets or nears passive house standards. The proposed IECC changes (below) are a step in the right direction. We simply have to move away from fossil fuels and making electric heating and cooling easy and more affordable is a good start. </p>

<p>I'm writing to ask that you include "Electric Vehicle Ready" and "Storage Ready" amendments to the commercial International Energy Conservation Code (IECC) and "Electric Vehicle Ready" and "Electric Readiness," to the residential IECC for Austin. The 2021 IECC is a good step forward, but it will be even better with these additions. </p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Michael Pellegrini

pellegrinimf@gmail.com

11500 Buttonwood Dr

Austin, Texas 78759-3854</p>

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<p>residential IECC comments,</p>

<p>Now is the time to build full electric capabilities into new buildings. It costs far less to build in appropriate wiring than to retrofit it later when needed. We need to build for the future - a future that is all electric.</p>

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Al Braden

al@albradenphoto.com

2810 W Fresco Dr.

Austin, Texas 78731</p>

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13 days ago 

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<p>Thank you for your time. I would like to stay informed as the Austin IECC update continues. </p>

<p>Steve Johnson

ableeasyllc@gmail.com

133 Belton St

McDade, Texas 78650</p>

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Thank you for considering my comments.

Sincerely,
 Rachel Hubka
12224 Forsythe Dr
Austin, TX 78759

22 days ago 

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<p>Nicole Tran

nicole.tran@utexas.edu

12166 metric blvd

Austin, Texas 78758</p>

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13 days ago 

The required U-value for fenestration of 0.35. Almost no aluminum windows can meet this standard. So the code is, by default, mandating vinyl windows (and the toxins emitted during manufacturing and in fires) in about 90% of new dwellings. While you can use fiberglass or wood frames instead, there is a cost premium that most builders will not pay -Paul Robbins (This is a concern of mine also. Catherine O'Toole)

22 days ago

Thank you for your comment and work in this area. The energy code remains agnostic to the materials used to construct windows. Instead it focuses on a performance specification to conserve energy in the thermal envelope. The code allows trade-offs between building components in each of the compliance paths. This allows designers to use windows with higher U-factors when specifying higher efficiency items elsewhere in the building.

13 days ago

R402.4.1.2- I'm concerned that we have not reduced our ACH50 requirement in several code cycles. This is an instance where we need to consider the building as a whole and look at the implications of infiltration loads. Our buildings are routinely suffering from humidity issues. Mechanical system deficiencies are often blamed for these issues. Sometimes that is justified but often, the problem arises from latent loads associated with infiltration and exhaust/supply ventilation strategies. Until we require tighter envelopes and disallow unconditioned OA ventilation strategies, we will continue to experience humidity issues. As we decrease sensible loads by increasing R-value requirements (ceiling insulation R-49), these issues will become even more pronounced.

22 days ago


Thank you for your comment in addressing humidity issues for residential buildings. Reducing interior latent loads due to exterior humid conditions will require coordination with other building codes. This conversation is far from over and I invite you to continue discussing to address this problem. The residential provisions of the IECC with Austin amendments also includes multifamily buildings where achieving 5 ACH50 still remains difficult for many.

13 days ago 

Tables 402.1.2 (1&2)- Consider provision to allow a ceiling/roof compliance option for c.i. X+ R Y in alignment with wall insulation options. Rationale- Roof c.i. of R-20 except for flat roofs is more difficult to achieve than R-8-R-10. Providing a hybrid option could encourage adoption of thermal breaks at roofline.

22 days ago

Thank you for your suggestion. More modeling and research would need to be conducted to determine potential R-X + Y ci options for attic roofline insulation. We proposed as a first step to move current attic roofline insulation values found in the footnotes of Tables R402.1.3 to the body of each table. The R-20 above deck and R-25 below deck prescriptive insulation requirements would remain unchanged. The footnotes would remain with the insulation values removed. An equivalent assembly U-factor will be added correspondingly to Tables R402.1.2.

13 days ago 

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Sincerely,
Ari Meyer
4404 Travis Country Cir Apt H3
Austin, TX 78735

23 days ago 

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1201 BENTWOOD RD
AUSTIN, TX 78722

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ERI Ratings, Section 401.2.1: Texas Gas Service (TGS) proposes adding performance options to both the residential and commercial performance paths based upon current federal rating systems and tools that use source energy. For the residential coverage, we would recommend proposing a new section (R407) implementing the Home Energy Score, which uses source energy and numerical rating of residential buildings and suggest incorporating terms for a 15% or better performance rating over base line design. For commercial building coverage, we would recommend a new section as well (C409) referencing use of Energy Star for Commercial Buildings and using its stated performance threshold score of 75 or better over the median rated performance score for the building class of 50. The proposed metrics are better suited for the purpose of directly calculating potential emission reductions because they incorporate source energy emissions and thereby provide a more robust account of emission reduction efforts attributable to consumer energy choice.

Section R403.5.4: TGS proposes the replacement of this amendment with a requirement for electric heat pump water heaters where electric water heating is employed. Specifically, the reference for demand response should be removed because demand response operation can be overridden in most water heater designs, and therefore is very difficult to enforce and monitor. Moreover, electric heat pumps reduce electricity demand and therefore alleviate the need for demand response.

Section R403.5.5: TGS recognizes the importance of energy choice and the important role that natural gas has had in providing resilient, reliable, and affordable to the residents of Austin. From 2016 through 2020, TGS has provided over \$3.8M in rebates for gas water heating, which have resulted in a savings of over 210,000 therms. TGS will continue to provide consumers with reliable natural gas service, including natural gas water heating.

Section 406: TGS requests clarification as to whether the methods for determining equivalency will be proposed to address the new efficiency package options.

Proposing new section (407) regarding home energy score: TGS proposes the inclusion of a new section, to be numbered as R407, that will establish guidelines for using the Home Energy Score. The Home Energy Score has been used to rate more than 150,000 homes nationwide and is strongly supported by the U. S. Department of Energy in the form of homeowner/homebuyer resources, assessor resources, and scoring methodology justification documentation. Improvements over the 2015 IECC, as amended and adopted by the City of Austin, would be based upon energy use calculations for the baseline and proposed design, not score rankings or energy cost estimates generated by the Home Energy Score tool. Use of the Home Energy Score energy use calculations is essential since energy efficiency improvement is consistent with the scope and intent of the IECC. The 2015 IECC, as amended and adopted, is used for the baseline design since currently proposed changes to the Austin Energy Code and the proposed 15% or greater improvement serves as a consistent basis for improvement over current code. The allowance for use of different combinations of systems permitted by the 2015 IECC, as amended and adopted, helps ensure consistency between the prescriptive path of current code with improvements in performances as rated. Sample text is provided below.

[New Section – R407]: The proposed design shall be 15% more efficient or greater in energy use than an equivalent baseline design meeting the minimum prescriptive requirements of the 2015 IECC, as amended, as rated using Home Energy Score, U. S. Department of Energy. Mechanical and envelop systems for the baseline shall be any combination of systems permitted by the prescriptive requirements of the 2015 IECC, as amended. The proposed design rated performance shall be recorded as a Home Energy Score Report.

23 days ago


Thank you for your comments and suggestions.

Section R403.5.4: Heat pump water heaters cannot be currently mandated since it would be in violation of the federal preemption provisions of the Energy Policy and Conservation Act (EPCA). Minimum efficiency requirements for appliances and equipment by fuel/type are set at the Federal level by the Energy Policy and Conservation Act. It is considered preemption of that Act to pass local minimum requirements for specific types of equipment that are more stringent than the federal standard. It should be noted that heat pump water heaters also remain an allowed exception within this code and an option to fulfil R408 Additional Efficiency Package Options. It is acknowledged that demand response events can be overridden, however, most often participants do not choose to override.

Section R403.5.5: Thank you in your continuing efforts and partnering with Austin Energy to increase energy efficiency for the residents of Austin regardless of fuel type.

Section R406: There are no proposed amendments for Section R408 Additional Efficiency Package Options. We direct you to documents available from the ICC regarding the 2021 IECC adoption process regarding this code item. Visit <https://www.iccsafe.org/products-and-services/i-codes/code-development-process/2019-group-b/>.

New Section R407, Home Energy Score: Thank you for your suggestion. While not limited to, the Home Energy Score appears to be tailored to the existing home market. Additionally, the infrastructure to require the Home Energy Score is not available in Texas currently. The DOE website lists only four approved assessors for the state of Texas, whom are also available nationwide. For alternative pathways to be considered they need to apply across all of the segments proposed, able to be applied during the design phase of construction and be widely accessible and supported.

13 days ago 

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HVAC Fault detection, Section C403.2.3: To ensure that true faults, including undercharging of refrigerant cycles are adequately captured, TGS proposes that criteria for "fault" status should be based in part upon operation of electric resistance heating above the technical balance point of electrical refrigeration (air conditioning and heat pumps) during heating cycles. Temperature-based balance point criteria for faults could also be used, although such criteria are going to be a combination of equipment and installation conditions and ambient temperatures.

Energy Monitoring, Section C405.12: TGS proposes a requirement that reported electrical monitoring include source energy consumption calculations using conversion factors relevant to Austin's electricity sources.

New section, portfolio manager tool: TGS proposes the addition of a new section, C409, to establish the Portfolio Manager Tool supported by energy star for commercial buildings as the energy performance requirement for commercial buildings. Including the Energy Star for Commercial Buildings performance criteria allows for a transparent and objective basis for energy performance analysis and documentation. The Portfolio Manager tool has been used to benchmark over 200,000 commercial building for energy performance, and over 12,600 commercial buildings have met the Energy Star for Commercial Buildings certification requirements of a rating of 75 or higher. This proposal would apply the Portfolio Manager tool to demonstrate performance without requiring an Energy Star for Commercial Buildings certification.

[New Section – C409] The proposed design shall meet the requirements of Energy Star for Commercial Buildings or rated performance of 75 or higher using Portfolio Manager supported by Energy Star for Commercial Buildings.

23 days ago

Thank you, only the commercial portion of the comment will be addressed here. Both Energy Star for Commercial Buildings and Portfolio Manager require billing data and thus the building to exist to verify compliance. This would not achieve the fundamental goal of plan review or inspections to verify compliance before a building is built. Neither of these programs were intended or developed as code compliance tools. On a broader level, the scope of the energy code is limited to the effective use of energy at the building level and thus does not encompass topics external to that such as a distinction between site and source energy.

HVAC fault detection and Energy Monitoring: Currently, neither the IECC nor ASHRAE 90.1 seek to define what constitutes a fault or to configure what information is displayed beyond the basics. This is left up to projects to decide and to coordinate with operations. What the code does seek to do is require that equipment to detect faults and monitor energy use be provided and that information be able to be appropriately communicated to personnel.

18 days ago

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Thank you for considering my comments.

Sincerely,
 Ed Fiedler
11505 June Dr
Austin, TX 78753

23 days ago 

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Sincerely,
 Terry Kays
8524 Neider Dr
Austin, TX 78749

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Sincerely,
 james seehafer
14508 Owen Tech Blvd
Austin, TX 78728

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Sincerely,
 Carolyn Croom
Austin, TX 78757

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Sincerely,
 Lisa Silguero
PO Box 40636
Austin, TX 78704

23 days ago 

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Sincerely,
Greg Sells
3300 Parker Ln Apt 258
Austin, TX 78741

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 Amy Weappa
813 W Mary St
Austin, TX 78704

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 Romalda Allsup
2111 Quarry Rd
Austin, TX 78703

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10901 Plumewood Drive
Austin, TX 78750

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16001 Crystal Hills Dr
Austin, TX 78737

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Draft Electric Vehicle Ready requirements for residential buildings: <https://newbuildings.org/wp-content/uploads/2019/05/CE217-P2.pdf>


Electric Readiness provisions should be required for residential buildings. The buildings constructed today will still be in use decades from now. Even if a builder or the first occupant of a building chooses natural gas appliances, it is highly likely that a future occupant will want electric appliances. Modern heat pumps make water and space heating more efficient and affordable with electricity, compared to natural gas. Providing wiring that allows future building occupants to easily swap out a natural gas appliance for an electric appliance will save money and allow for emissions reductions.
Draft Electric Readiness requirements for residential buildings: https://newbuildings.org/wp-content/uploads/2019/11/2019-Group-B-CAH-compressed_RE147.pdf

Thank you for considering my comments.

Sincerely,
 Sonia Santana
2005 Barton Parkway
Austin, TX 78704

23 days ago 

The ICC ruled during the 2021 codes appeal process that codes related to EV and Electric-readiness are outside the current scope and intent of the energy provisions of the IECC. With the change in consensus process procedures by the ICC there has also come a change in scope for the IECC. Given the amount of support for further discussions on EV ready and electrification, Austin Energy is committed to having a robust community dialogue about options for pursuing those goals. There are a number of underlying drivers for adopting the 2021 code with minimal new amendments now and allowing time for careful consideration for the full range of potential options available for enabling our community to further transportation electrification and electric readiness. These include passage of the entire body of building codes and enacting them in unison to prevent confusion of the initiation dates of the various codes as well as to meet the requirements of the Building Code Effectiveness Grading Schedule from the Insurance Services Office. Once that additional discussion has taken place, an action plan for executing on those ideas can be undertaken. There is a recent precedent for mid-cycle evaluation and action on building and city codes demonstrated by adoption of the Solar Ready local amendment to the energy code which went through the stakeholder and Council approval process as a stand-alone item after adoption of the 2015 IECC by the City.

13 days ago 

Dear Austin Energy Residential IECC comments,

 Thank you for the opportunity to comment on the draft International Energy Conservation Code (IECC) for Austin. I support the adoption of the 2021 IECC as an important step for achieving our climate goals and reducing energy costs.

I'm also glad to see that there will no longer be a requirement for new buildings constructed near a natural gas line to use the fossil fuel for hot water heating. Builders should be free to choose clean, efficient electric water heating options.

I would like the IECC code updates to include provisions that make it easy and affordable for future occupants of buildings to install electric vehicle chargers and electric appliances. Phasing out the use of fossil fuels for transportation and appliances in buildings is key to reducing greenhouse gas emissions. It will be cheaper and easier to make this transition if buildings are wired to accommodate these changes from the start.

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Thank you for considering my comments.

Sincerely,
 Marc Lionetti
2200 Dickson Dr
Austin, TX 78704

23 days ago 

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Thank you for considering my comments.

Sincerely,
 Rainbow Di Benedetto
7708 Waldon Dr
Austin, TX 78750

23 days ago 

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13 days ago 

Patricia,

I tried to access these proposed building code revisions Saturday and obviously could not.

So I have started to scan the summary attachment that you sent Tuesday.

My understanding is that this applied to all Residential single family units, and multifamily units that are under 3 stories. Please correct me if I am wrong.

So far, I have two concerns.

1. The requirement for gas water heating when access is adjacent is removed, but no compensation for efficiency is offered. I propose that Heat Pump Water Heaters should be required in all new single-fuel units, with an additional requirement that they be replaced with HPWHs when the original units are obsolete.

2. I am concerned about the required U-value for fenestration of 0.35. Almost no aluminum windows can meet this standard. So the code is, by default, mandating vinyl windows (and the toxins emitted during manufacturing and in fires) in about 90% of new dwellings. While you can use fiberglass or wood frames instead, there is a cost premium that most builders will not pay.

I propose that an easy method or chart be developed to allow trade off of U-value in window frames with other energy-efficiency upgrades.

Please call me so we can discuss this.

Sincerely,

Paul Robbins
(512) 447-8712

24 days ago 

Thank you for your comment and work in this area.

1. The installation of timers remain required for electric resistance water heating equipment. Additionally, options will be included for open source demand response protocols. Heat pump water heaters cannot be currently mandated since it would be in violation of the federal preemption provisions of the Energy Policy and Conservation Act (EPCA). Minimum efficiency requirements for appliances and equipment by fuel/type are set at the Federal level by the Energy Policy and Conservation Act. It is considered preemption of that Act to pass local minimum requirements for specific types of equipment that are more stringent than the federal standard. It should be noted that heat pump water heaters also remain an allowed exception within this code and an option to fulfil R408 Additional Efficiency Package Options.

2. The energy code remains agnostic to the materials used to construct windows. Instead it focuses on a performance specification to conserve energy in the thermal envelope. The code allows trade-offs between building components in each of the compliance paths. This allows designers to use windows with higher U-factors when specifying higher efficiency items elsewhere in the building.

13 days ago 

While I recognize this would be a new addition to the code, I would like to suggest Austin consider adding a requirement based on new addenda recently published for ASHRAE 90.1. In short, we suggest you consider 90.1-2019 as a new on-site renewable energy requirement. The published addenda may be downloaded from <https://www.ashrae.org/file%20library/technical%20resources/standards%20and%20guidelines/standards%20addenda>. These new requirements were completed after publication of ASHRAE 90.1-2019, but are now available for Austin. Therefore appropriate for consideration here.

I represent the National Glass Association and Aluminum Extruders Council, whom together have over 1800 members across North America. I am also co-vice-chair of the ASHRAE 90.1 committee. While I do not speak for the Association, I can provide further information on how the proposed changes relate to work done there.


Addendum BY is a prescriptive requirement to install a minimum amount of on-site renewable energy systems. The primary requirement is in Section 10. This is a prescriptive requirement that may be traded off in Section 11. Addenda CK and CP adjust the baselines for the Section 11 Energy Cost Budget performance path and Appendix A, respectively, to be consistent with the prescriptive requirement.

This would apply to building types covered by ASHRAE 90.1 including all nonresidential as well as residential choose to focus on just nonresidential if you so choose.

25 days ago

Thank you, these addenda are an exciting addition to the Standard. Generally, Austin does not incorporate approved addenda but prefers to adopt them as the Standard is published. This is to avoid the potential for confusion and possible coordination issues with other future addenda or codes. There are exceptions, such as when a clarification is necessary, or an error has been discovered.

Still, we're very much looking forward to this. So much so that we have questions about its content and hope that you'll be able to help. Please feel free to email me directly at Michael.husted@austinenergy.com so I can share with you what those questions are.

25 days ago 

Recommend local amendment to require whole building air leakage testing per ASTM E779 for all commercial buildings to verify code section C402.5.1 Air barriers. It is the only way to verify these requirements. The cost of performing this test, even on very large high-rise buildings is becoming quite affordable. There is precedent in other cities, such as Seattle, making this requirement with significantly improved building performance and culture.

25 days ago

Section C402.5.2 was intended to require envelope testing in what amounts to the residences in Group R2 commercial buildings. However, the way exception 3 to C402.5.1.2 is worded, there is some question as to whether this testing is actually required by the 2021 IECC or if projects can comply using the current methodology if they choose not to test. We're hoping for clarification from ICC on this in the forthcoming commentary.

This represents a significant but sensible step into envelope testing for commercial buildings. The technology and expertise is already in place to perform unguarded testing in low-rise multifamily buildings so it's logical to extend this to high-rise multifamily. Whether to extend this to all commercial properties raises questions about service availability and affordability that will be difficult to address at this late date without delaying the balance of the code significantly.

25 days ago

Several changes to the amendments related to Commissioning (largely deletions), most reference the fact that Commissioning is now part of the published Code (which it is), but this document indicates that the entire IECC Code Section C408 (which is where Commissioning appears) is deleted. Clarification on exactly where designers need to look for the new code would be helpful. Or if the Commissioning requirement is going away altogether, that should be clarified.

one month ago

All this is administratively complicated but in order to amend a section, we first need to delete it and then add it back in its amended form. The proposal this cycle is to simply not delete section C408 from the published code which is why there's a local strikethrough to that current deletion. Hope this makes sense!

one month ago

With the new alignment of IECC with ASHRAE outlined in Section: C403.2.3, will designers now be able to "mix and match" energy compliance calculations (ComChecks), and if so, is that being codified (I did not see anything to this effect).

one month ago

No, that was removed back in 2012 (I think). There's an "or" in C401.2 that codifies this. Thanks!

one month ago
