



November 28, 2017

Final Comments on Intro. 1629-A

The American Council of Engineering Companies of New York (ACEC New York) appreciates the opportunity to share the following additional comments with you regarding Intro 1629-A, per the latest draft of November 20th.

Due to the potential for hardship associated with the 70% threshold for the 2025 milestone, we recommend you incorporate the “hardship relief” clause that is included for the 2019 and 2022 milestones also into the 2025 milestone:

...commissioner determines that proposed amendments to this code to achieve compliance with item 2 would render the design and construction of buildings impracticable or unduly burdensome, the commissioner shall submit to the city council proposed amendments to ensure that the predicted energy use of buildings designed and constructed in compliance with this code is, to the fullest extent practicable, on average, less than the predicted energy use of such buildings if such buildings were designed and constructed in minimum compliance with ASHRAE 90.1-2013, provided that, together with such proposed amendments, the commissioner shall submit a report describing (i) why proposed amendments to achieve compliance with such item would render the design and construction of buildings impracticable or unduly burdensome and (ii) the estimated percentage by which the predicted energy use of buildings designed and constructed in compliance with this code would be less than the predicted energy use of such buildings if such buildings were designed and constructed in minimum compliance with ASHRAE 90.1-2013.

For further information please contact:

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The American Council of Engineering Companies of New York (ACEC New York) is the voice of the professional engineering community, representing 280 member firms throughout New York State that collectively employ close to 25,000 people statewide, with a concentrated presence of firms located in New York City. Our members plan and design the structural, mechanical, electrical, civil, environmental, plumbing, fire protection and technology systems for the city’s buildings and infrastructure.