

*Sent via Electronic Mail*

January 18, 2019

Lisa Hennigh  
Administrator of Professional Services  
Capital Development Board  
401 S. Spring Street  
3<sup>rd</sup> Floor Stratton Building  
Springfield, IL 62706  
[lisa.hennigh@illinois.gov](mailto:lisa.hennigh@illinois.gov)

**Re: Energy Efficiency Advocates and Businesses Support the Adoption of the  
2018 International Energy Conservation Code**

Dear Ms. Hennigh,

The undersigned organizations represent advocates and businesses that support improvements in building energy efficiency. We appreciate the opportunity to comment on the proposed rule that will update the Illinois Energy Conservation Code to the 2018 International Energy Conservation Code (2018 IECC). The adoption of the 2018 IECC represents a continuation of long-standing Illinois policy and will support cost-effective building energy efficiency solutions that reduce greenhouse gas emissions, energy use and costs for Illinois families and businesses.

Illinois is a leader in energy efficiency and currently ranks 12<sup>th</sup> in the 2018 State Energy Efficiency Scorecard published by the American Council for an Energy-Efficient Economy. This ranking is supported in large part by the State's buildings policies. The adoption of the 2018 IECC is a commonsense policy that will build upon, or even improve, this ranking in future years.

With commercial and residential buildings consuming 44% of the State's energy,<sup>1</sup> building energy codes represent an important opportunity to reduce the negative environmental and economic consequences of this energy use. Additionally, this policy tool is critical for improving the energy efficiency of existing buildings undergoing alterations as well the construction of new buildings. The U.S. Department of Energy estimates that for Illinois alone, energy codes will result in energy savings of \$2.3 billion and avoided CO2 emissions of 16.7

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<sup>1</sup> See <https://www.eia.gov/state/?sid=IL#tabs-2>.

million metric tons (cumulative 2010-2040).<sup>2</sup> These CO2 emissions savings equate to the annual emissions of 35 million passenger vehicles.

On top of these benefits, the adoption of the 2018 IECC will serve to support a major source of jobs for the State. The energy-efficient economy is responsible for 2.25 million jobs nationwide, according to the 2018 U.S. Energy and Employment Report. In Illinois alone, energy efficiency generates approximately 87,000 jobs (2017). Additionally, the insulation industry employs nearly 20,000 workers through the manufacture, distribution, and installation of its products. With many of these jobs related to the construction sector, the 2018 IECC will serve as a strong foundation for this important workforce.

In conclusion, we strongly encourage the adoption of the Capital Development Board's proposed rule as published in the Illinois Register on December 7, 2018 (Volume 42, Issue 49).

Sincerely,

American Chemistry Council  
Cellulose Insulation Manufacturers Association  
Chemical Industry Council of Illinois  
EPS Industry Alliance  
High Performance Insulation Professionals  
Insulation Contractors Association of America  
National Insulation Association  
North American Insulation Manufacturers Association  
Polyisocyanurate Insulation Manufacturers Association  
Responsible Energy Codes Alliance  
Spray Polyurethane Foam Association  
Structural Insulated Panel Association

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<sup>2</sup> RA Athalye et al., *Impacts of Model Building Energy Codes*, Pacific Northwest National Laboratory, October 2016. [https://www.energycodes.gov/sites/default/files/documents/Impacts\\_of\\_Model\\_Energy\\_Codes.pdf](https://www.energycodes.gov/sites/default/files/documents/Impacts_of_Model_Energy_Codes.pdf).