

*Sent via Electronic Mail*

February 8, 2019

Senator Justin Wayne  
Chairman of the Urban Affairs Committee  
Nebraska Legislature  
Room #1212  
P.O. Box 94604  
Lincoln, Nebraska 68509  
[jwayne@leg.ne.gov](mailto:jwayne@leg.ne.gov)

**Re: Nebraska Legislation Adopting the 2018 International Energy Conservation Code**

Dear Chairman Wayne,

The Polyisocyanurate Insulation Manufacturers Association (PIMA) is writing in support of LB 405, a bill that would update Nebraska's building energy code to the 2018 International Energy Conservation Code (IECC). Keeping the State's energy code updated to the current version of the IECC is an important and cost-effective policy for addressing the negative economic and environmental impacts caused by building energy waste – a sector that is responsible for 40% of total U.S. energy use. This practice will help Nebraska achieve a range of benefits, including:

- Reduced air pollution;
- Consumer and business cost savings;
- Increased flexibility and reliability of our energy system and grid;
- Reduced peak energy demand; and
- Improved energy productivity and a stronger economy.

Staying current with the model energy code ensures that Nebraska will benefit from the regular improvements in construction practices and component technologies. This is especially true in the area of commercial buildings where the relative fast pace of innovation has resulted in significant energy savings over the last three code cycles (8% in the most recent cycle alone!).

Moving from Nebraska's current energy code, which is based on the 2009 IECC, to the 2018 IECC will lower Nebraska's energy costs by approximately 30% for commercial buildings<sup>1</sup> and at least 21.5% for residential buildings.<sup>2</sup> Also, this significant jump in energy efficiency could not be more cost effective. For

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<sup>1</sup> DOE, Building Energy Code Program, State Level Commercial Codes Energy Use (December 2018). Available at: <https://www.energycodes.gov/adoption/state-code-adoption-tracking-analysis>.

<sup>2</sup> V. Mendon et al., Cost-Effectiveness Analysis of the Residential Provisions of the 2015 IECC for Nebraska, Pacific Northwest National Laboratory, February 2016 (DOE has not completed an evaluation of the residential provision of the 2018 IECC yet, but the energy-efficiency improvements over the 2015 IECC are expected to be relatively modest and the cost-effectiveness should be similar.)

residential buildings, the simple payback period for this energy-efficiency improvement is 2.9 years and the resulting net annual cash flow savings is \$362 for the average Nebraska homeowner.<sup>3</sup> For commercial buildings, the simple payback period for Nebraska for moving from the 2009 IECC (ASHRAE 90.1-2007) to the 2012 IECC (ASHRAE 90.1-2010) is 4.9 years<sup>4</sup> and for moving from the 2012 IECC (ASHRAE 90.1-2010) to the 2015 IECC (ASHRAE90.1-2013) is immediate!<sup>5</sup>

Most of the country now views stronger building energy codes as an effective policy that benefits the economy and the environment. In fact, at least 65% of the U.S. population resides in areas of the country that have adopted either the 2015 or 2018 IECC, clearly demonstrating that strong energy codes are a popular and a cost effective energy policy. An important reason for this is the positive impact energy codes have on jobs and the local economy, and it is easy to see why. Buildings are responsible for 74% of U.S. electricity consumption and for Nebraska most of this electricity is produced by burning out-of-state coal and natural gas. In 2018, coal and natural gas provided 79% of the state's net electricity generation and all of this coal and natural gas came from out-of-state.<sup>6</sup> Because of this, weak building energy codes results in more money leaving Nebraska to pay for coal and natural gas produced in other states, whereas investments in energy efficiency directly benefit the State's local economy.

## About PIMA

PIMA is the trade association for North American manufacturers of rigid polyiso foam insulation – a product that is used in most low-slope commercial roofs as well as in commercial and residential walls. Polyiso insulation products and the raw materials used to manufacture polyiso are produced in over 50 manufacturing facilities across North America. The insulation industry overall employs over 3,700 workers in the Nebraska.

Thank you for the opportunity to submit these comments. Please contact me should additional information be necessary ([jkoscher@pima.org](mailto:jkoscher@pima.org); (703) 224-2289).

Sincerely,



Justin Koscher  
President

Cc: Precious McKesson  
[pmckesson@leg.ne.gov](mailto:pmckesson@leg.ne.gov)

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<sup>3</sup> Ibid.

<sup>4</sup> R. Hart, et al., *Cost-Effectiveness of ASHRAE Standard 90.1-2010 for the State of Nebraska*, Pacific Northwest National Laboratory, November, 2013, [https://www.energycodes.gov/development/commercial/cost\\_effectiveness\\_archive](https://www.energycodes.gov/development/commercial/cost_effectiveness_archive)

<sup>5</sup> R. Hart, et al., *Cost-Effectiveness of ASHRAE Standard 90.1-2013 for the State of Nebraska*, Pacific Northwest National Laboratory, December 2015, [https://www.energycodes.gov/sites/default/files/documents/Cost-effectiveness\\_of\\_ASHRAE\\_Standard\\_90-1-2013-Nebraska.pdf](https://www.energycodes.gov/sites/default/files/documents/Cost-effectiveness_of_ASHRAE_Standard_90-1-2013-Nebraska.pdf) (DOE has not completed a cost-effectiveness analysis of the 2018 IECC commercial provisions (ASHRAE 90.1-2016).)

<sup>6</sup> U.S. Energy Information Administration, <https://www.eia.gov/state/?sid=NE#tabs-4>