

March 27, 2019

Joint Committee on Administrative Rules
Illinois General Assembly
700 Stratton Office Building
Springfield, Illinois 62706
jcar@ilga.gov

**Re: Rulemakings Scheduled for JCAR Review (4/9/19)
Capital Development Board
Illinois Energy Conservation Code (71 Ill. Adm. Code 600)
First Notice Published: 42 Ill. Reg. 21491 - 12/7/18**

Dear Committee Members,

The Polyisocyanurate Insulation Manufacturers Association (PIMA) appreciates the opportunity to provide these comments regarding the Capital Development Board's (CDB) proposed rule (captioned above) to adopt revisions to the Illinois Energy Conservation Code. This code provides the minimum requirements for energy use and conservation in both public and private buildings. PIMA fully supports the proposed rule as it provides for cost-effective measures that help manage energy costs for Illinois consumers and businesses as well as reduce the negative environmental impacts of operating homes and buildings. We encourage the Joint Committee on Administrative Rules to approve the proposed rule as submitted.

PIMA represents manufacturers of polyisocyanurate (or polyiso) insulation, which is a product used in the construction of low-slope roofs as well as in commercial and residential walls. Polyiso insulation, like other insulation materials, is installed as part of the building envelope in order to minimize energy loss and operating costs. PIMA manufacturing and raw material supply members operate three manufacturing sites in Illinois – East Moline, Elwood, and Franklin Park. Overall, the insulation industry employs nearly 20,000 workers in the State.¹

PIMA's expertise is primarily in commercial buildings and our comments herein will focus on the proposed rule's positive impacts for this sector.

Illinois's Energy Efficient Building Act:

The *Energy Efficient Building Act* (EEBA) (20 ILCS 3125) directs CDB to review and adopt the International Energy Conservation Code (IECC) as the minimum requirements for commercial buildings. The IECC is a model code developed by representatives from local government, industry, and the general public using an open, transparent, and consensus-based process. The IECC is reviewed and updated by this

¹ *The Contributions of Insulation to the U.S. Economy in 2018*, American Chemistry Council (available at: <https://polyurethane.americanchemistry.com/The-Contributions-of-Insulation-to-the-US-Economy.pdf>).

body of experts every three years. Importantly, the IECC is a performance-based code, which allows individual users to select the best designs and construction materials for their projects.

In the United States, commercial and residential buildings as a sector account for approximately 40% of total energy use and greenhouse gas emissions. Illinois adopted EEBA in recognition of these sizeable impacts and the availability of cost-effective solutions like building energy codes that can greatly reduce energy use and emissions. The legislative intent of EEBA is to reduce air pollutant emissions, address peak energy demand, assure the reliability of the electric grid, and control energy costs for residents and businesses. CDB's proposed rule fulfills this statutory intent by adopting the 2018 IECC with minimal changes or weakening amendments.

Positive Impacts for Illinois Consumers and Businesses:

The result is an energy code that will reduce energy use in commercial buildings by approximately 8% as measured against existing requirements.² These savings are largely the result of more stringent requirements for window SHGC, mechanical equipment, lighting, and controls. With respect to requirements for the opaque envelope (e.g., roofs, walls, and floors), the proposed rule maintains the same requirements that were adopted in prior CDB rulemakings. These requirements have been successfully implemented in Illinois and many other states.

Conclusion:

We commend CDB for leading an inclusive and deliberative rulemaking process and encourage the Committee to support the proposed rule. The proposed rule maintains the State's long-standing commitment to building energy efficiency for both commercial and residential buildings.

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

Sincerely,



Justin Koscher
President

Cc: Lisa Hennigh, Capital Development Board
lisa.hennigh@illinois.gov

² "Energy Savings Analysis ANSI/ASHRAE/IES Standard 90.1-2016," Office of Energy Efficiency & Renewable Energy, U.S. Department of Energy (June 2017). Available at: <https://www.energycodes.gov/development/determinations>.