June 27, 2022

Amanda Johnson, Rules Analyst
Michigan Department of Licensing and Regulatory Affairs
Bureau of Construction Code, Administrative Services Division
611 W. Ottawa Street
Lansing, Michigan 48933
LARA-BCC-Rules@michigan.gov

Re: Support for Adoption of the 2021 International Energy Conservation Code
(Pending Rule Sets 2021-48LR and 2021-49LR)

Dear Ms. Johnson,

The Polyisocyanurate Insulation Manufacturers Association (PIMA) is writing in support of the proposed rules for adopting the 2021 IECC for residential and commercial buildings. 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 consequences of energy waste in buildings – a sector that is responsible for 40% of total U.S. energy use. Importantly, Michigan will benefit from the removal of several previously adopted amendments that in the past weakened the code’s stringency and undermined the achievement of State’s climate goals. Also, adopting the 2021 IECC will help Michigan achieve a range of benefits, including:

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

Staying current with the model energy code ensures that Michigan will benefit from the regular improvements in construction practices and building technology. This is especially true for alterations performed on commercial buildings and ensures that the energy code will drive energy efficiency improvements in existing buildings when components are replaced or when buildings are otherwise altered.

Moving from Michigan’s current energy code, which is based on the 2015 IECC (and the ASHRAE Standard 90.1-2013), to the 2021 IECC will save Michigan residents money and increase employment. Also, this change is clearly cost effective. For commercial buildings, this change has a simple payback that is immediate, and for residential buildings purchased with a mortgage, there would
be a positive net savings within 5 years. Over 30 years, about 15,000 jobs would result from these stronger energy codes.¹

Most of the country views stronger building energy codes as an effective policy that benefits the environment and the economy. Like Michigan, your neighbors -- Illinois and Ohio -- are in the midst of adopting the 2021 IECC for both residential and commercial buildings and Wisconsin is close to adopting this code for commercial buildings and will soon start its review for residential buildings.

Buildings are responsible for 74% of total electricity consumption in the United States. Twenty-seven percent of Michigan’s electricity is still generated by burning coal, a product that comes entirely from out-of-state.² As a result, weak building energy codes send money out of Michigan to purchase coal. Adopting the 2021 IECC will improve building energy efficiency, reduce energy use and waste, and result in investments that benefit the state and local economies.

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 12,000 workers in the Michigan.

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
