

August 22, 2018

Mr. Gregory Furnish  
Commissioner and Chairman, Indiana Residential Code Committee  
Indiana Government Center South  
302 West Washington Street  
Indianapolis, IN 46204

**Re: Energy Conservation Requirements of the 2018 International Residential Code**

Dear Chairman Furnish,

We support the Committee's efforts to review and update the current Indiana Residential Code to the 2018 IRC. In the current review process we believe further consideration needs to be given to the energy efficiency provisions in Chapter 11 of the IRC. The proposals from the Responsible Energy Code Alliance and the Midwest Energy Efficiency Alliance are aligned with the 2018 IRC, present a clear, data-based argument, and should be adopted by the Committee. These proposals will drive improvements in energy efficiency, conservation, public health and wellness that will create jobs and improve the statewide and local economies.

According to a 2016 report, the clean energy sector supports more than 47,720 jobs in Indiana. A large majority of those jobs - 81 percent - are in energy efficiency. All of these 38,453 energy efficiency jobs are interdependent with the building industry, whether it be HVAC, insulation, lighting or manufacturing. They are good, in-state jobs in a vital, growing sector of Indiana's economy.<sup>1</sup> We have an opportunity to build on this investment, improve the livability and resiliency of new homes, reduce energy waste, continue to spur local construction and manufacturing jobs, and become a leader in strong building energy codes throughout the region.

The RECA/MEEA proposals restore the balance designed into the 2018 IRC. The 2018 IRC provides flexibility with numerous compliance paths including a prescriptive path that provides alternative approaches of minimum R-value requirements, maximum assembly U-factor requirements and an area weighted U-factor method, a performance path, and an Energy Rating Index path. A builder can benefit from this flexibility to find their lowest-cost path to achieving code. These options are internally balanced; a weakening amendment to one path will create a loophole in the energy code. An amendment that results in paths of varying efficiency defeats the purpose of a minimum standard and may deceive citizens and residents about the energy, air quality, moisture control, and general performance of their homes.

Representing the businesses of energy efficiency, we know a strong energy code with the flexibility of many equally strong compliance paths will unleash the power of competition without picking winners or losers. For example, the proposed cavity insulation and continuous insulation options are constructible with various products. For instance, multi-functional insulation materials can simplify construction. In contrast, state-specific amendments to the energy code can increase legal, contracting, design, and materials transaction costs.

Indiana builders are able to construct homes that meet the 2018 IRC Chapter 11. The 2018 IRC provides guidance for practical matters such as cladding attachments to support constructability and compliance. In addition, manufacturers provide installation instructions for use of their products. Various third-party resources are available to support code compliance with helpful practices for construction.

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<sup>1</sup> See Clean Energy Trust, Clean Jobs Indiana. <https://www.cleanjobsmidwest.com/state/indiana>

Available resources provide a variety of actionable and code-compliant solutions to optimize moisture control, integrate various wall functions and components, and equip builders/designers with conventional or more advanced options for resilient, energy efficient performance. Thus, as with many forms of construction (including conventional framing, advanced wood framing, SIPs panels, ICF forms, etc.) there are significant resources available to support not just one but many reasonable options.

Sincerely,

George Phelps, Manager, Product & Legislative Affairs, **Knauf Insulation**

Jay Murdoch, Director, Government & Industry Affairs, **Owens Corning**

Curt Rich, President & CEO, **North American Insulation Manufacturers Association**

David Mann, Senior Director, Building & Construction, **American Chemistry Council**

Justin Koscher, President, **Polyisocyanurate Insulation Manufacturers Association**