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Sent via email

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Indiana Residential Code Committee  
Indiana Government Center South  
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Indianapolis, IN 46204  
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**Re: Review and Adoption of Chapter 11 of the 2018 International Residential Code**

Dear Members of the Indiana Residential Code Committee:

Thank you for the opportunity to provide input regarding Indiana's review of Chapter 11 of the 2018 International Residential Code (IRC). The Polyisocyanurate Insulation Manufacturers Association (PIMA) is a strong proponent of cost-effective energy efficiency solutions. We believe a modernized energy code will benefit homeowners throughout the State. We are also an important stakeholder in this process and part of an insulation industry that employs more than 13,000 Hoosiers.

Energy efficiency remains the low-cost option for meeting energy demand. Increased energy efficiency in residential homes means more money in the pocketbooks of homeowners. And the savings can be substantial. A U.S. Department of Energy analysis of Indiana's building code found that an update to the 2015 IRC Chapter 11 would take the average homeowner just 3.8 years to completely payback those costs with energy savings – with total savings of \$5,826 over 30 years.<sup>1</sup> A second analysis performed by the Midwest Energy Efficiency Alliance demonstrates that cost savings under the 2018 IRC would be cash flow positive in less than 8 months and result in life-cycle savings of over \$6,500.

Modern energy codes also protect society's most vulnerable homeowners and tenants from rising or unpredictable energy costs. Low-income households or individuals living on fixed incomes can be forced to choose between paying their monthly utility bill and spending on life's other necessities. This population already spends an average of 7.2 percent of their income on energy bills compared to the

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<sup>1</sup> See U.S. Department of Energy, *Cost-Effectiveness Analysis of the Residential Provisions of the 2015 IECC for Indiana* (Feb. 2016). Report available at: [https://www.energycodes.gov/sites/default/files/documents/IndianaResidentialCostEffectiveness\\_2015.pdf](https://www.energycodes.gov/sites/default/files/documents/IndianaResidentialCostEffectiveness_2015.pdf).

national average of 3.5 percent.<sup>2</sup> The adoption of the 2018 IRC would help reduce this burden and save households hundreds of dollars per year.

Additionally, adopting the 2018 IRC requirements would keep Indiana competitive with neighboring states that have implemented energy efficiency gains over the past several years. Moreover, the State and stakeholders like homebuilders can be confident that cost-effective solutions are available to meet the enhanced requirements of the 2018 IRC. PIMA members are in the business of producing high-performance insulation products that allow new and existing homes to meet more stringent requirements for thermal performance without significant changes to building practices. And where building practices may need to evolve, the insulation industry has a long history of providing technical support and training to the building trades.

To conclude, an updated energy code is in the best interest of Indiana residents and businesses. Adopting the requirements of Chapter 11 of the 2018 IRC will deliver practical gains in energy efficiency for homes throughout the State.

Please contact me should additional information be helpful to the Committee's review process.

Sincerely,



Justin Koscher  
President

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<sup>2</sup> See "Lifting the High Energy Burden in America's Largest Cities: How energy efficiency can improve low income and underserved communities." Report available at: [https://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden\\_0.pdf](https://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden_0.pdf).