

State Board of Building Regulations and Standards
Commonwealth of Massachusetts
One Ashburton Place, Room 1301
Boston, MA 02108

May 14, 2013

RE: May 14, 2013 Public Hearing – Comments in Support of Proposals to Update Massachusetts State Building Code (780 CMR) to MA-amended 2012 International Energy Conservation Code (IECC)

Dear Board Members:

The Building Codes Assistance Project (BCAP) strongly supports the proposals before the Massachusetts State Board of Building Regulations and Standards (BBRS) to update the MA State Building Code (780 CMR) and its present baseline energy code requirements for residential and commercial buildings from a Massachusetts-amended 2009 International Energy Conservation Code (MA-amended 2009 IECC) to a MA-amended 2012 IECC.ⁱ

Adopting the proposals as written will maintain the Commonwealth's standing as a national leader in sensible and efficient building practices and the effective use of energy. Households and businesses also stand to benefit from the adoption of the 2012 IECC in many ways.

Support for Adoption of the 2012 IECC

The 2012 IECC is the final product of a well-developed, long-standing model code development process that involves the nation's leading experts in energy efficiency, building design and product performance professionals, state and local governmental officials, product manufacturers, architects, and builders – including representatives from Massachusetts. The code is estimated to improve the energy efficiency of new and renovated residential and commercial building construction by about 14 to 18 percent above the 2009 IECC (the base energy code of the current state building code).ⁱⁱ

By adopting the 2012 IECC, the Commonwealth of Massachusetts will stay on track of its energy efficiency goals, and will provide benefits to building owners, homeowners, and individual tenants for many years. New construction is the most cost-effective time to install better insulation, quality windows and doors, and efficient heating and cooling equipment that is properly sized. Construction costs should be reduced through economies of scale, as suppliers and retailers reduce inventories and streamline production to meet these new energy targets.

Finally, the benefits of these code changes will result in immediate and continuing savings for both businesses and residences throughout the Commonwealth that build or remodel. They also will hold down the increasing costs of energy from higher demand that would occur if not adopted, and reduce continued reliance on older and more expensive power generators, a leading contributor to high energy bills in mid-Atlantic and Northeast states.

Residential and Commercial Energy Improvements of the 2012 IECC

Specific improvements incorporated into the 2012 IECC for residential buildings in Massachusetts include the following:

- Improvements to the permanent thermal building envelope, including better window requirements and stronger insulation requirements
- Tighter thermal envelope from improved air leakage testing
- Less duct leakage in HVAC distribution systems
- More efficient hot water systems
- More efficient lighting
- Consistency among the energy requirements referenced throughout the Commonwealth's construction codes based on the International Residential Code (IRC), International Building Code (IBC), and the IECC.

Specific improvements incorporated into the 2012 IECC for non-residential buildings in Massachusetts include the following:

- Improved thermal envelope
- Updated and improved equipment efficiency
- New technical upgrades
- Innovative options

Steps Forward

Building energy efficiency should continue to be a central component of Massachusetts's efforts to secure a stable and prosperous energy future. BCAP welcomes the opportunity to work with the state's appropriate agencies to support the Commonwealth's implementation of the 2012 IECC. We offer our assistance to plan training and other implementation activities, should you so desire.

Sincerely,



Maureen Guttman, AIA
BCAP Executive Director and
Senior Director of Building Programs
(202) 530-2211
mguttman@ase.org

ⁱ Massachusetts Executive Office of Public Safety and Security. "Notice of Public Hearing to Address Proposals to the MA State Building Code (780 CMR)." <http://www.mass.gov/eopss/consumer-prot-and-bus-lic/license-type/csl/notice-of-public-hearing-to-address-proposals-to-the-ma.html>. See *Item 8 proposals*.

ⁱⁱ Alliance to Save Energy. November 4, 2010. <http://ase.org/efficiencynews/code-vastly-improve-energy-efficiency-home-commercial-building-construction>