Dear Council Member Bernal:

Over the next few weeks, the City Council will decide whether to adopt the 2012 IECC and give San Antonio’s new homebuyers nearly $6,000 in average net energy savings . . . or not. For the sake of your constituents, our broad-based Energy Efficient Codes Coalition strongly urges you to adopt the 2012 IECC residential chapter as soon as possible. The 2012 residential building energy code has been adopted by over 30 Texas cities and its energy saving benefits have been documented by both the US Department of Energy and Texas A&M’s Energy Systems Laboratory.

While San Antonio has historically supported stronger residential building energy codes, we are concerned to have learned that the City Council is considering delaying action until the 2015 IECC is ready for adoption. As I discuss later in this letter, there is virtually no difference between the 2012 IECC and the 2015 IECC.

If you wait, the homes that will be built between now and the time when the 2015 IECC has been published by the International Code Council, thoroughly evaluated by both the US Department of Energy and the Energy Systems Laboratory, and adopted by the City Council will not only cost an average of $5,961 more to maintain over the first 30 years. But because those homes may last three times that long, the energy bills to subsequent owners of each home with be thousands of dollars more expensive.

Stated simply, the savings from the 2012 IECC constitute real money that will either stay in the wallets of new home buyers – where it could be used to buy home necessities, put a down payment on a car, or socked away for college tuition – or go to a utility to pay for energy that didn’t have to be wasted.

Low Income Homebuyers Will Be the Beneficiaries or the Casualties of Your Decision

Most disturbing is that a delay in the adoption of the 2012 IECC will hurt those who are least able to waste energy: low income families. As you can see by our roster at the end of this letter, low income housing advocates are strong supporters of stronger energy codes.

During the year-long cycle that developed the 2012 IECC, the National Housing Institute – an EECC supporter – supplied the following written statement to the local and state code and other officials who were voting on it:

“Putting money back in the pockets of consumers, rather than throwing it out the window as wasted energy, could make all the difference in keeping people in their homes when energy costs rise and tough economic times continue. . . . High utility bills negatively impact low income families the most as they are typically the fourth highest expense in a family’s budget. Furthermore several studies have demonstrated a strong connection between a family’s inability to pay its home energy bills and consequences, such as homelessness, malnutrition, and poor health.”

During oral testimony, the NHI witness said that it is a real tragedy when a low income family has finally realized their dream of home ownership, only to lose their home because they cannot afford to pay their energy bills.

Many chapters of Habitat for Humanity require their low income homes to meet the most current national model energy code. A Habitat for Humanity bulletin titled “Energy Efficiency Makes Homes More Affordable” states that “Simple energy efficiency improvements can cut energy costs by over 40% in most affordable housing. The money that families save on energy can help them make mortgage payments, and pay for food, clothing, and other essentials.” It goes on to say “While some energy features add to construction costs, others can reduce costs. For example, increasing insulation and sealing air

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[1] An analysis EECC commissioned from ICF, International and the Building Codes Assistance Project found that over the 30-year life of their mortgage, the average San Antonio resident purchasing a home meeting the 2012 IECC will pocket $5,961 in utility savings, after fully recouping the added cost of efficiency improvements to the home.
leaks reduce heating and cooling needs, allowing the use of smaller equipment and ductwork. The savings on the mechanical systems can pay for the increased cost of insulation and air sealing.”

Don’t Wait . . . There's Virtually No Difference Between the 2012 and 2015 IECCs

Because there is virtually no difference between the efficiency requirements of residential prescriptive and performance paths of the 2012 and 2015 IECC, delaying San Antonio’s energy code adoption for until the 2015 is ready will only delay passing its benefits on to your constituents.

The efficiency differences between the 2012 and 2015 IECC are so minimal they would fit on a 3x5 card. For the City Council, if you adopt the 2012 IECC, upgrading it to the 2015 IECC later will amount to a relatively minor amendment. In fact, the only significant change included in the 2015 IECC is a new compliance path that allows builders to meet the same stringency as the 2012 IECC using an Energy Rating Index (ERI) such as the Home Energy Rating Score (or HERS). Since the ERI simply confirms that the 2012 IECC has been achieved, one option immediately available to the City Council would be to adopt the 2012 IECC now, but add the ERI compliance plan in the 2015 IECC.

Texas’ Problem: Electricity Use Butting Up Against Electricity Supply

As the nation saw from the rolling brownouts before and after the 2011 Super Bowl in Dallas, Texas has a problem . . . it doesn’t have enough electricity generation to meet the peak energy requirements of the state. The problem will only get worse as the state’s economy and population grow.

The 2012 IECC's “whole house” improvements not only reduce overall energy use, which helps stabilize energy demand and prices, but they also insulate homes from extreme temperatures, which helps stabilize the power grid at peak times when it is most vulnerable.

- After the 2012 IECC was developed, a white paper by the Institute for Electric Efficiency (a non-profit research arm for investor-owned utilities) concluded that continued savings of the magnitude of recent efficiency gains in building energy codes and appliance standards “will completely offset the anticipated growth in demand in the residential, commercial, and industrial sectors combined, eliminating the need for additional power plants to serve these sectors through 2025.” Stated differently: No new power plants.

Building more energy efficient homes will not only benefit their owners, but they will benefit the state as well.

Energy efficiency doesn’t mean doing less; it means doing as much or more but using less energy to get it done. It is a win-win proposal for the people of San Antonio and the state’s power grid.

The Energy Efficient Codes Coalition strongly urges you to reduce the utility bills of your constituents by adopting the 2012 IECC for San Antonio. Please feel free to call or e-mail me if I can answer any questions or be of any assistance.

Sincerely,

William D. Fay
Executive Director
Energy Efficient Codes Coalition

An Uncommon Alliance of Advocates  Since EECC’s launch in 2007, we have expanded our support beyond the charter organizations who participated in EECC’s formation, engaging support from an impressive and diverse array of energy efficiency advocates, which currently include:

**Government**
ICLEI
National Association of State Energy Officials

**Broad Based Energy Efficiency Groups**
The Alliance to Save Energy
American Council for an Energy-Efficient Economy (ACEEE)

**Regional Energy Alliances**
Midwest Energy Efficiency Alliance (MEEA)
Northeast Energy Efficiency Partnerships (NEEP)
Northwest Energy Efficiency Alliance (NEEA)
Southeast Energy Efficiency Alliance (SEEA)
South-central Partnership for Energy Efficiency as a Resource (SPEER)
Southwest Energy Efficiency Project (SWEEP)

**Academia/Think Tanks**
American College and University Presidents Climate Commitment
Institute for Market Transformation

**Affordable Housing Advocates**
Enterprise Community Partners
Housing Assistance Council
LISC – Local Initiatives Support Corporation
National Housing Institute
National Low Income Housing Coalition

**Architecture**
American Institute of Architects
Architecture 2030

**Builders**
Green Builder® Coalition

**Business**
American Chemistry Council
Business Council for Sustainable Energy
Council of NAIMA
Extruded Polystyrene Foam Association (XPSA)
North American Insulation Manufacturers Association (NAIMA)
Polyisocyanurate Insulation Manufacturers Association (PIMA)
Structural Insulated Panel Association (SIPA)

**Energy Consumers**
Consumers Federation of America
National Consumer Law Center
Public Citizen

**Environmental Groups**
Center for Environment, Commerce & Energy
Climate Crisis Coalition
Community Environmental Council
Environment America
Environmental Law and Policy Center
National Wildlife Federation
Natural Resources Defense Council (NRDC)
Sierra Club

Faith-Based Groups
American Values Network

Labor
Blue Green Alliance

Utilities
American Public Power Association
Edison Electric Institute
National Rural Electric Cooperative Association