



Filed Via Email (buildingenergycodesworkshop2021BC0013@ee.doe.gov)

July 30, 2021

Mr. Jeremiah Williams
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

RE: Comments in Response to Department of Energy’s Office of Energy Efficiency and Renewable Energy Notice of Virtual Stakeholder Workshop on the Future of Building Energy Codes, Docket No. EERE-2021-BT-BC-0013, 86 Fed. Reg. 36269

Dear Mr. Williams:

The American Gas Association (“AGA”) respectfully submits these comments in response to the Department of Energy’s (“DOE”) request for comment pertaining to its two-day workshop on the Future of Building Energy Codes that took place virtually on June 22 and 24, 2021 (“Future of Energy Codes Workshop”).¹

I. Introduction

The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 76 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — more than 72 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than thirty percent of the United States’ energy needs.

AGA appreciates DOE’s efforts to support the development and adoption of the model energy building codes that are adopted by states and jurisdictions throughout the United States.

¹ See *Future of Energy Codes Workshop; Reopening of the Public Comment Period*, Docket No. EERE-2021-BT-BC-0013, 86 Fed. Reg. 36269 (July 9, 2021).

The technical and economic analysis by DOE on provisions considered for inclusion into new editions of the model energy codes are crucial in supporting the advancement of residential and commercial model energy codes that meet the criteria of being economically justified and improving energy efficiency.

AGA is also pleased that DOE sponsored the June 22 and June 24th Future of Energy Codes Workshop for a public forum to have a dialogue on DOE's programs to provide support for improving building energy efficiency code requirements and to receive feedback from the public on these efforts. AGA participated and encouraged our members to engage in the discussion as well. AGA also recognizes DOE's legislative requirements in the Energy Conservation and Production Act to review updated editions of the International Energy Conservation Code ("IECC") for residential homes and the ANSI/ASHRAE/IESNA² Standard 90.1 for commercial buildings to make a determination of whether updated editions improve energy efficiency in those two codes.

II. DOE Should Refrain from Supporting Additional Code Mandates Beyond the Model Code Provisions

AGA has been and continues to be supportive of the development of new editions of both the IECC and the ANSI/ASHRAE/IESNA Standard 90.1 that improve energy efficiency for the built environment and are cost effective. AGA believes that the direct use of natural gas in applications covered by those codes play a significant role in maintaining the affordability of residential and commercial buildings covered by those codes. Therefore, AGA is concerned with some stakeholder's efforts to include provisions in either or both codes that would encourage or require new or renovated homes or buildings built to these codes to discourage or disallow the use of natural gas and instead promote all electric energy applications. Provisions that discourage or eliminate the option of natural gas for homes and businesses could have the undesired effect of increasing overall energy use and removing an often viable economic and environmental energy choice.

AGA understands that DOE is expanding technical assistance to help states and municipalities to adopt the latest codes. That is helpful and within the scope of DOE. However, encouraging code provisions that require electric vehicle charging stations or imposing additional electrical supply outlets in homes and businesses in anticipation of an all-electric future is not in the nation's or the consumers' best interest. These add on "electrification" provisions would increase the cost and affordability of the home or building without any certainty that they will ever be used and/or if they were, would improve the energy efficiency or reduce the carbon footprint of the home or building. AGA, therefore, requests that DOE not support adding proposed energy code provisions to the IECC that have not been vetted through the ICC code development process. Such provisions can result in unintended consequences of increasing emissions and energy use. AGA also offers the following recommendations and comments on several issues discussed during the Future of Energy Codes Workshop:

² ANSI—American National Standards Institute; ASHRAE—American Society of Heating, Refrigerating, and Air-Conditioning Engineers; IES—Illuminating Engineering Society.

- AGA supports that the current model energy codes—2021 IECC and 90.1-2019— are appropriate baselines for model energy code development and agree that they should serve as the basis for future code advancement.
- AGA supports the continuation of the option of having both prescriptive and performance-based compliance paths included in future energy codes. We do, however, believe that in using either path, that the metric for measuring energy consumption needs to be based on “source energy” measurements. Source energy, also referred to as “full fuel cycle” measured energy, provides the most technically accurate method for determining the overall energy consumption and energy savings of the built environment.
- AGA does not support model energy codes requirements that include provisions outside the defined intent of the model energy code. For example, the AGA does not encourage or support “electrification” and “electric-readiness” at the expense of the direct use of natural gas. AGA believes that because of the wide diversity of issues faced by the built environment, from climactic locations, energy cost, energy availability, the model energy codes need to be fuel neutral and provide energy code provisions and requirements that are not biased against any energy source. As referred to above, in the recent IECC code development activity, proposals for making a requirement that residential homes furnace and water heating locations be “electric ready” for future conversions from fossil fuel to electricity have no place in model energy codes. These types of provisions discourage installing natural gas furnaces and water heaters and encourage the installation of electric appliances (furnaces and water heaters) in new construction since if there is a requirement that the home be “electric ready,” chances are that the builder will install electric heating and water heating appliances. Again, these “electrification” provisions would increase the cost and affordability of the home or building without any certainty that they will ever be used and/or if they were, would improve the energy efficiency or reduce the carbon footprint of the home or building.
- AGA supports and encourages strong involvement in the code development process for both the IECC and ASHRAE 90.1 model energy codes. Both model code development process now use a balanced committee approach to develop revisions to the existing editions of the codes. All interested stakeholders and the public in general, have the opportunity to submit code change proposals to the existing editions of both codes, can provide responses to the actions the committees take on the proposals and challenge committee decisions make on proposals. Both the IECC and ASHRAE 90.1 committees post all submitted proposals and committee actions on the submittals and proposers can challenge committee actions if they so choose.

III. Conclusion

Thank you in advance for your consideration of our comments and recommendations. AGA looks forward to working with DOE in advancing model energy codes that do not discourage the use of natural gas and instead provide reasonable and cost-effective provisions that improve

energy efficiency in homes and buildings. If there are any technical questions concerning these comments, please contact Jim Ranfone, the Managing Director of Codes and Standards at the American Gas Association, jranfone@aga.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. J. Agen", is written above a horizontal line.

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