

**Question:** Does the new Appendix CK meet the Board’s stated requirement that “future additional requirements and modifications to existing sections to the IECC both main text and appendices must comply with the Scope and Intent statements. Provisions in both the main body of the code and the optional appendices must achieve a reasonable level of energy efficiency that is safe, technologically feasible, and lifecycle cost effective, considering economic feasibility, including potential costs and savings for consumers and building owners, and return on investment”?

**Background:**

Appendix CK was approved by the Commercial Consensus Committee for inclusion in the 2027 IECC without any evidence that it would result in improved energy efficiency in commercial occupancies.

The proposed Annex CK fails to align with the criteria established in the Board of Directors’ interpretation of the 2027 Scope and Intent issued in June 2025. The Board stated that “Provisions in both the main body of the code and the optional appendices must achieve a reasonable level of energy efficiency that is safe, technologically feasible, and lifecycle cost effective, considering economic feasibility, including potential costs and savings for consumers and building owners, and return on investment” (emphasis added).

The proposed appendix lacks substantiated evidence demonstrating lifecycle cost-effectiveness. The proponent acknowledged an increase in construction costs without providing data to support corresponding energy savings. The appendix appears to disregard energy costs in evaluating the justification for higher construction expenditures.

The new appendix does not require higher efficiency electric equipment, renewable energy sources, or a higher threshold for energy credits. Therefore, the proposed appendix does not provide “provisions incorporating additional energy efficiency and greenhouse gas reduction resources” as provided for by the Intent. In fact, encouraging the use of minimum-efficiency electric heat pumps is expected to increase demand on the electrical grid, much of which will be met by natural gas-fired power plants. Numerous studies have shown that direct-use natural gas equipment generally results in lower overall energy consumption and emissions compared to electric alternatives reliant on the national grid. As such, the appendix does not offer meaningful improvements in energy efficiency or greenhouse gas reductions.

In addition, this approach contravenes the principle of fuel neutrality as stipulated in the International Energy Conservation Code (IECC). Specifically, the appendix mandates that all proposed designs be evaluated against the site energy usage of minimum-efficiency fuel gas-fired equipment, thereby promoting electric heating technologies.

For many years, the Environmental Protection Agency has advocated using source energy for efficiency determination. Specifically:

“EPA has determined that source energy is the most equitable unit of evaluation for comparing different buildings to each other. Source energy represents the total amount of raw fuel that is required to operate the building. It incorporates all transmission, delivery, and production losses. By taking all energy use into account, the score provides a complete assessment of energy efficiency in a building.”

<https://www.energystar.gov/buildings/benchmark/understand-metrics/source-site-difference>)

Adoption of this appendix may also undermine the overarching objective of energy conservation. According to the U.S. Energy Information Administration's 2025 Energy Outlook, natural gas is projected to remain a major source of electricity generation for at least the next two decades, even under optimistic zero-carbon scenarios. Additionally, the repeal of renewable energy incentives under the legislation signed in July 2025 further diminishes the likelihood of achieving low-cost zero-carbon energy.

Finally, Committee Members continue to use the argument that nonmandatory appendices impose no obligations because they are nonmandatory. These appendices are drafted in mandatory language and are often advocated for adoption at the jurisdictional level, effectively making them compulsory. In this instance, such adoption would impose unnecessary costs on consumers and have adverse environmental consequences.

Therefore, further guidance is needed from the Board of Directors to determine if the IECC Consensus Committee and Subgroup actions and reasons are consistent with the Board's previous interpretation of the IECC Scope and Intent.