



Shaping Tomorrow's  
Built Environment Today

August 15, 2022

Mr. Andrew Bick  
Chairman  
Idaho Building Code Board  
11341 W Chinden Blvd.  
Boise, Idaho 83714

Sent via email to: [Michael.hyde@dopl.idaho.gov](mailto:Michael.hyde@dopl.idaho.gov)

Re: Proposed Amendments to IDAPA 24.39.30, Rules of Building Safety

Dear Chairman Bick and Board Members:

I am writing on behalf of ASHRAE regarding the proposed revisions to the Idaho State Building and Energy Codes. ASHRAE, founded in 1894, is a technical and professional society of more than 51,000 members, including over 150 members in Idaho, that focus on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today. ASHRAE has a direct interest in and concern with building energy codes, and is one of the few organizations with the expertise, membership, and mission to directly affect the energy use efficiency in current and future buildings.

ASHRAE's Position Document on Energy Efficiency in Buildings states that "building-related standards are effective tools for improving energy use efficiency. Energy codes, standards, benchmarks [and] ratings... provide significant value to building owners and managers."<sup>1</sup> **Several of the code sections that this rulemaking proposes to remove regard commissioning requirements, mechanical requirements, water heating, and lighting efficiencies. These are all important aspects of the current building energy code that, if removed, would make the code less effective and less efficient, resulting in higher operating costs. These proposed changes would effectively roll-back the code to earlier versions of ASHRAE Standard 90.1 and the IECC.**

**Idaho's current state codes, ASHRAE 90.1-2016 for commercial buildings and the 2018 International Energy Conservation Code (IECC) for residential buildings, have demonstrated cost-effectiveness and efficiency.** With ASHRAE 90.1-2016, commercial buildings will save an average of \$5.59 per square foot of building space over the life cycle of the building, as compared to the previous edition of the standard, 90.1-2013.<sup>2</sup> The 2018 IECC

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<sup>1</sup> ASHRAE Position Document on Energy Efficiency in Buildings, January 2020:

[https://www.ashrae.org/file%20library/about/position%20documents/pd\\_energyefficiencyinbuildings\\_2020.pdf](https://www.ashrae.org/file%20library/about/position%20documents/pd_energyefficiencyinbuildings_2020.pdf)

<sup>2</sup> Cost Effectiveness of ASHRAE Standard 90.1-2016 for Idaho, Pacific Northwest National Laboratory, August 2020:

[https://www.energycodes.gov/sites/default/files/2021-03/Cost-effectiveness\\_of\\_ASHRAE\\_Standard\\_90-1-2016-Idaho.pdf](https://www.energycodes.gov/sites/default/files/2021-03/Cost-effectiveness_of_ASHRAE_Standard_90-1-2016-Idaho.pdf)

provides cost-effective savings for residential buildings, with average cost savings of \$1,962.21 per dwelling unit over the life cycle of the building, as compared to the previous edition of the standard, the 2012 IECC. It also provides an average of 9.6%, or \$121.87, in energy cost savings for residential buildings in the first year after adoption of the IECC 2018.<sup>3</sup>

**The current codes provide a net benefit to the people of Idaho, including a healthier and more sustainable built environment. ASHRAE opposes rolling back requirements in the state energy code.** Buildings built in accordance with modern building standards are not only more efficient, but provide a healthier, more comfortable, and more resilient space for building occupants. Building energy codes represent a dependable and readily available solution for states and local governments to incorporate into their resilience planning, reducing total energy demand and associated greenhouse gas emissions, and also providing constituents with everyday benefits in the form of buildings that are more comfortable, more resilient, and at a lower cost to own and operate.<sup>4</sup>

Again, we appreciate your consideration of our comments regarding these proposed changes to the building code. ASHRAE would be happy to address any questions you might have. Please feel free to contact me or have your staff contact [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org).

Sincerely,

Thomas Simenc  
Thomas R Simenc  
Boise Chapter President

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<sup>3</sup> Cost-Effectiveness Analysis of the Residential Provisions of the 2018 IECC for Idaho, Pacific Northwest National Laboratory, April 2021: [https://www.energycodes.gov/sites/default/files/2021-06/IdahoResidentialCostEffectiveness\\_2018.pdf](https://www.energycodes.gov/sites/default/files/2021-06/IdahoResidentialCostEffectiveness_2018.pdf)

<sup>4</sup> Idaho State Analysis, U.S. Department of Energy, Building Energy Codes Program, July 2021: [https://www.energycodes.gov/sites/default/files/2021-07/EED\\_1365\\_BROCH\\_StateEnergyCodes\\_states\\_IDAHO.pdf](https://www.energycodes.gov/sites/default/files/2021-07/EED_1365_BROCH_StateEnergyCodes_states_IDAHO.pdf)