

Summary of Comments  
From the Public Hearing on  
Proposed Rule 675 IAC 19-4 (LSA Document # 16-329)  
to Readopt the 2010 Indiana Energy Conservation Code

Pursuant to IC 4-22-2-26, the Fire Prevention and Building Safety Commission held a public hearing on the proposed rule to readopt 675 IAC 19-4 (LSA Document # 16-329), the 2010 Indiana Energy Conservation Code. The public hearing was held at the Indiana Government Center South, Conference Center Room D, Indianapolis, IN 46204. The hearing was staffed by Justin Guedel, Staff Attorney for the Indiana Department of Homeland Security; Douglas Boyle, Director of the Fire Prevention and Building Safety Commission; and Beth Sutor, Commission Staff. The public hearing was open for comments from 10:00 a.m. to 10:21 a.m. on Thursday, September 14, 2017. The following are the minutes of the public hearing.

Justin Guedel, Hearing Chairperson, called the hearing to order at 10:00 a.m., gave a brief explanation of the proposed rule, explained the process for submitting comments, and informed all present that comments would be reviewed by the Fire Prevention and Buildings Safety Commission at their next scheduled meeting on Tuesday October 3, 2017. The floor was then opened for public testimony.

The following is a summary of all comments received:

**Craig W. Wagner, Indiana Association of Building Officials (IABO):** supports readoption of 675 IAC 19-4 in order to maintain the State of Indiana's current standards.

**George R. Phelps, Knauf Insulation, Inc.:** supports readoption of 675 IAC 19-4 as it provides minimum requirements for the energy-efficient design of buildings, except Class 2 structures. No additional costs or requirements will be imposed, as this rule is currently in place. Mr. Phelps' prepared written comments are attached.

**Charles Cottrell, North American Insulation Manufacturers Association (NAIMA):** supports readoption of 675 IAC 19-4 on the grounds that it sets a minimum and reasonable expectation for energy efficiency in commercial buildings. Mr. Cottrell's prepared written comments are attached.

**Gretchen White, Indiana Apartment Association:** supports readoption of 675 IAC 19-4 as it sets the minimum expectations for energy efficiency.

**Douglas Fick, American Society of Heating, Refrigerating, and Air-Conditioning Engineers, Inc. (ASHRAE):** supports readoption of 675 IAC 19-4 as it was adopted by reference according to ANSI/ASHRAE Standard 90.1-2007. ASHRAE also encourages the commission to consider updating the rule to its most recent version of Standard 90.1, which is Standard 90.1-2016. Mr. Fick's prepared written comments are attached.

**Holly Thomas, IUPUI:** supports readoption of 675 IAC 19-4 in order to maintain the State of Indiana's current standards.

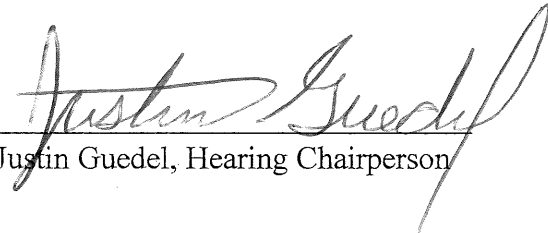
**Ian Blanding, Midwest Energy Efficiency Alliance (MEEA):** supports readoption of 675 IAC 19-4 in order to maintain the current minimum standards. Mr. Blanding's prepared written comments are attached.

**Ted Kussow, American Council of Engineering Companies (ACEC):** supports readoption of 675 IAC 19-4 on the grounds that commercial, industrial, and public projects would have no minimum energy standards if the current rule was allowed to expire, which would be unprecedented in the state of Indiana. Mr. Kussow's prepared written comments are attached.

**Daniel Overbey, AIA Indiana:** supports readoption of 675 IAC 19-4 as it provides minimum requirements for the energy-efficient design of buildings, except Class 2 structures. No costs or requirements will be imposed by this rule, as this rule is currently in place and the current regulatory scheme will be continued by re-adopting this rule. Mr. Overbey's prepared written comments are attached.

**Mark Riffey, Indiana Fire and Life Safety Coalition:** supports readoption of the 675 IAC 19-4 as it sets a minimum standard for energy efficiency, does not impose new regulations, and promotes fire safety. Mr. Riffey's prepared written comments are attached.

At 10:21 a.m., Mr. Guedel asked the audience if anyone else had comments to offer. Hearing none, the hearing was closed.

  
Justin Guedel, Hearing Chairperson

9/18/17  
Date:



September 11, 2017

**Knauf Insulation public comments in support of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code**

Mr. Chairman and members of the Fire Prevention and Building Safety Commission,

My name is George Phelps and I am the Public Affairs Manager for Knauf Insulation headquartered in Shelbyville, Indiana where approximately 800 employees manufacture insulation for homes, buildings and industry in North America.

We respectfully urge your favorable support of the re-adoption of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code. The proposed rule provides minimum requirements for the energy-efficient design of buildings, except Class 2 structures. No costs or requirements will be imposed by this rule, as this rule is currently in place and the current regulatory framework will be continued by re-adoption.

The energy code sets a minimum standard for energy efficiency for buildings that ensures reduced energy usage and reduced utility bills for consumers and companies. According to the U.S. Department of Energy, energy costs savings for Indiana resulting from the state continuing its commercial and residential codes are estimated to be upwards of \$240 million annually by 2030. History has demonstrated that long term energy costs can fluctuate significantly having an adverse impact on manufacturing costs and employment. This can be mitigated in part by re-adopting proposed rule 675 IAC 19-4, the 2010 Indiana Energy Code.

On behalf of all our hard working employees in Shelbyville and the citizens of Indiana, I again encourage you to re-adopt the 2010 Indiana Energy Conservation Code.

Thank you for your consideration.

Good morning

My name is Charles Cottrell and I represent the North American Insulation Manufacturers Association

Thank you for the opportunity to speak this morning

NAIMA's role is to promote energy efficiency in residential and commercial buildings - environmental preservation through the use of fiber glass and mineral wool insulation, and encourage the safe production and use of those materials.

NAIMA and our members support re-adopting the 2010 Indiana Energy Conservation Code.  
Rule 675 IAC 19-4

I understand the desire to reduce and eliminate excessive regulations

But the 2010 Indiana Energy Conservation Code sets a minimum and reasonable level of energy efficiency commercial buildings. Energy codes help protect the environment and more importantly protect building owners from excessive utility bills.

Do I believe that without an energy code many buildings will be built without insulation or decent quality windows? NO - I don't - professional builders understand the need for building a good quality - energy efficient envelope.

But without a minimum code substandard buildings could be built and buyers would not have any recourse.

The levels of efficiency in this code have been determined to be reasonable cost-effective by the US Department of Energy, the American Society of Heating and Refrigerating & Air-Conditioning Engineers and the ICC.

I urge you to retain the 2010 Indiana Energy Conservation Code.

Thank you for your time and consideration.



Shaping Tomorrow's  
Built Environment Today

**PUBLIC COMMENTS ON BEHALF OF ASHRAE**

**PROVIDED TO THE INDIANA FIRE PREVENTION AND BUILDING SAFETY  
COMMISSION**

**INDIANA GOVERNMENT CENTER SOUTH  
302 WEST WASHINGTON STREET, ROOM E208  
INDIANAPOLIS, INDIANA 46204**

**THURSDAY, SEPTEMBER 14, 2017 10:00 A.M.**

My name is Douglas Fick and I am here today as a member of the ASHRAE Board of Directors, a licensed Professional Engineer and an Indiana resident to register our support for re-adoption of the state's Commercial Energy Code, which is ANSI/ASHRAE/IES Standard 90.1. ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 56,000 members worldwide, with over 600 members and four Chapters in Indiana, 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.

This Standard, first published in 1975, is the basis for the energy standard of most U.S. commercial buildings. For over 40 years, this Standard has served as the leading resource for state and local jurisdictions that wish to promote energy efficiency, engaging interests across the building and construction sector, and yielding increased levels of efficiency in a balanced manner with input from all affected parties. As are all ASHRAE Standards, Standard 90.1 is developed and improved through the private-sector in accordance with American National Standards Institute's (ANSI) consensus-driven process. While ASHRAE encourages states and jurisdictions to use the most recent version of Standard 90.1, which is 90.1-2016, we support Indiana's re-adoption of its current commercial energy code.



Shaping Tomorrow's  
Built Environment Today

Indiana should be a leader in the application of strong building codes and standards to protect families, businesses and visitors, and ASHRAE considers energy codes to be part of that strong package of codes. Strong codes help ensure our communities are safe, efficient and resilient. We encourage Indiana to, at a minimum, re-adopt Standard 90.1-2007 and strongly encourage the state to consider adopting even more advanced standards, which would result in additional energy and cost savings. Since buildings account for 70 percent of electricity use and nearly 40 percent of total energy use in the U.S., strong commercial energy codes present one of the most straightforward ways to lower energy use and save money for the citizens of Indiana

Thank you for the opportunity to provide public comments today. I welcome the opportunity to respond to any of your questions.



13 N. Wacker Drive, Suite 1301  
Chicago, Illinois 60606  
312.587.8390 Main Line  
312.587.8391 Fax  
[www.meealliance.org](http://www.meealliance.org)

September 14, 2017

**MEEA's comments in support of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code**

Mr. Chairman and members of the Fire Prevention and Building Safety Commission:

Thank you for the opportunity to speak on Indiana's code adoption process. My name is Ian Blanding, Senior Policy Associate with the Midwest Energy Efficiency Alliance. MEEA is a member-based non-profit organization that promotes cost-effective energy efficiency policies in the Midwest. We have worked with previous Administrations and provided technical assistance on Indiana's building energy codes.

MEEA strongly recommends you re-adopt the 2010 Indiana Energy Conservation Code, proposed rule 675 IAC 19-4. Re-adoption will ensure there is not a lapse in critical minimum energy efficiency standards for commercial buildings throughout the state, and will maintain current standards that **have already been in place for six years.**

The commercial energy code is essential to protecting consumers by guaranteeing a **minimum level** of building efficiency. Without it, commercial buildings would no longer be required to be built with minimum energy saving measures and thus not perform the way **businesses and residents have come to expect.** This underperformance would lead to increased utility bills, reduced comfort, and reduced indoor air quality. This leaves building tenants and businesses with less money to invest in the local economy and suboptimal indoor environments where they live and work.

Buildings account for roughly 40% of all energy used in the United States, and building energy codes are consistently shown to be the most cost-effective tool to reduce that usage – putting significant savings back into the pockets of consumers. Based on a recent MEEA analysis, Indiana's current residential and commercial **energy codes have saved consumers over 110 million dollars to date.** Without a statewide energy code, the building advancements and energy savings could slowly be eroded over time.

Indiana's building industry could also be at a disadvantage, as it could prove difficult to compete with construction companies in the surrounding states that are maintaining or updating their commercial energy codes.

For these reasons, we encourage you to re-adopt the 2010 Indiana Energy Conservation Code.

Sincerely,

Ian Blanding  
Senior Policy Associate



AMERICAN COUNCIL OF ENGINEERING COMPANIES

of Indiana

55 Monument Circle, Suite 819  
Indianapolis, IN 46204-2951  
(317) 637-3563  
Fax (317) 637-9968  
Web www.acecindiana.org  
E-mail staff@acecindiana.org

To: Indiana Fire Prevention and Building Safety Commission

From: ACEC Indiana

Sent via email: Justin K. Guedel, Indiana Department of Homeland Security (IDHS) Staff Attorney, [JGuedel@dhs.IN.gov](mailto:JGuedel@dhs.IN.gov), Beth Sutor, IDHS Secretary, [bsutor@dhs.IN.gov](mailto:bsutor@dhs.IN.gov)

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Indianapolis

Michael A. Rowe, P.E.  
United Consulting  
Indianapolis

John D. Taylor, P.E.  
CE Solutions  
Carmel

ASSOCIATE MEMBER REP.  
Scott Sutton, CPA, CDA, MSA  
Somerset CPAs, P.C.  
Indianapolis

Mr. Chairman and members of the Fire Prevention and Building Safety Commission, my name is Ted Kussow, P.E. LEEP AP BD+C. I am a Project Engineer and I represent the American Council of Engineering Companies of Indiana, which represents roughly 4,500 Hoosier engineers and employees. We respectfully urge your favorable support of the re-adoption of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code.

**WHY IS THE ENERGY CODE NECESSARY?**

- This building energy code is essential to our state because buildings have a lifespan of more than 50 years and buildings are responsible for more than 40% of the nation's energy use.
- Inefficient new construction practices can lead to a higher energy use over the lifetime of the building.
- Reduced energy keeps money in company's and resident's pockets.
- Reduced electricity and natural gas use under improved building energy codes also help our utilities better manage the distribution of energy during peak demand times.

**WHO BENEFITS?**

- Owners benefit from the energy code because lower energy expenditures mean they have more money to invest in the local economy.
- Hoosiers spend up to 50% of their income on household energy. Energy codes reduce energy bills and afford Hoosiers a better chance at financial prosperity.
- Energy codes also result in higher quality, safer, and more comfortable buildings. Without the energy code, building insulation would be minimal allowing increased health issues from moisture infiltration, mold and use of space heaters.
- The building industry also benefits from the energy code because it promotes job creation, resulting in an increased tax base.
- Best practices in high efficiency construction technologies lead to sustainable designs that benefit us all.

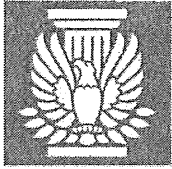
If allowed to expire, commercial, industrial, and public projects would have no minimum energy standards. This would be unprecedented for our State. All but eight states have an energy code including all of our surrounding states

ACEC considers our energy code to be of substantial benefit to Indiana economically as well as a safeguard to the health, safety and welfare of all Hoosiers. We encourage you to support the re-adoption of the 2010 Indiana Energy Code. We welcome any questions the Commission may have. Thank you for your time and consideration of this matter.

Michael Obergfell, PE  
Vice President, USI Consultants  
[obergfell@usiconsultants.com](mailto:obergfell@usiconsultants.com)

Beth Bauer, CAE  
Executive Director, ACEC Indiana  
[bbauer@acecindiana.org](mailto:bbauer@acecindiana.org)





# AIA Indiana

September 14, 2017

## **AIA Indiana public comments in support of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code**

Mr. Chairman and members of the Fire Prevention and Building Safety Commission, my name is Daniel Overbey, AIA and I represent the American Institute of Architects – Indiana Chapter, which represents roughly 750 Hoosier architects. We respectfully urge your favorable support of the re-adoption of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code. The proposed rule provides minimum requirements for the energy-efficient design of buildings, except Class 2 structures. No costs or requirements will be imposed by this rule, as this rule is currently in place and the current regulatory scheme will be continued by readopting this rule.

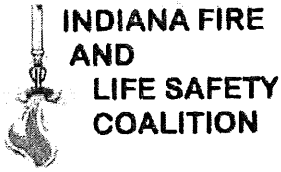
The energy code ensures reduced energy usage and reduced utility bills – which puts money back into individuals' and companies' pockets. How much? According to the U.S. Department of Energy, energy cost savings for Hoosiers resulting from the State maintaining its commercial and residential building energy codes are estimated to be on the order of nearly \$240 million annually by 2030. Considering the uncertainty of long-term energy costs, an energy code better ensures the State is safeguarded against a potentially-devastating economic hardship should energy costs rise considerably. Please note, Indiana would be the only state in the region (Ohio, Kentucky, Illinois, and Michigan) without an energy code if it's not re-adopted.

Furthermore, as the expiration of the energy code would eliminate all requirements for buildings to be insulated; AIA Indiana is gravely concerned about the potential for health issues arising from moisture and mold, as well as potential fire hazards resulting from space heaters used to compensate for the uneven temperatures common to uninsulated buildings.

AIA Indiana considers our energy code to be a net benefit to Indiana economically, as well as a safeguard to the lives of Hoosiers across our State, and again strongly supports the re-adoption of the 2010 Indiana Energy Conservation Code. If the Commission needs any additional information or has any question, please do not hesitate to contact me or AIA Indiana. Thank you.

Daniel Overbey, AIA  
President, AIA Indianapolis – A Section of AIA Indiana

AIA Indiana, Jason Shelley, Executive Director  
115 W. Washington St., Suite 955, Indianapolis, IN 46204  
Phone (317) 634-6993  
[www.aiaindiana.org](http://www.aiaindiana.org) • [jshelley@aiaindiana.org](mailto:jshelley@aiaindiana.org)



July 1, 2017

The Honorable Eric Holcomb

Governor of Indiana

200 W. Washington St., Rm. 206

Indianapolis, IN 46204

Dear Governor Holcomb:

With respect, the Indiana Fire and Life Safety Coalition encourages you to support the re-adoption of the 2010 Indiana Energy Conservation Code.

The code sets a minimum standard for energy efficiency for buildings. Buildings constructed to meet a minimum standard through an energy code use less energy, reduces utilities bills, creates affordable housing – and saves money for both companies and individuals.

The Energy Code better ensures the state is safeguarded against a potentially-devastating economic hardship should energy costs rise considerably. Also, buildings held to a standard by an energy code support utility grid reliability and support making utility bills more predictable.

The Energy Conservation Code promotes Fire Safety especially during the winter months. A major cause of fires during the heating months is directly attributed to supplementing heating systems with portable devices that are operated by ignitable fuels or powered often by overloaded extension cords.

Again, the IFLSC supports offers to serve as advisors to any committees that are formed for the re-adoption of the 2010 Indiana Energy Conservation Code or to study an updated version of the Energy Conservation Code.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Mark Riffey, Chairman Indiana Fire and Life Safety Coalition

Summary of Written Comments  
Proposed Rule 675 IAC 19-4 (LSA Document # 16-329)  
to Readopt the 2010 Energy Conservation Code

The following is a summary of the written comments received on the proposed rule readopting 675 IAC 19-4, the 2010 Energy Conservation Code:

All written comments received were in support of re adoption.

Below is a list of the proponents who submitted written comments. Copies of the written comments have been attached. Please note that the written comments that were read into the record at the public hearing are attached to the "Summary of Comments From the Public Hearing" and are not included here.

**Curt Rich, North American Insulation Manufacturers Association (NAIMA)**

**Carlie J. Hopper, Indiana Builders Association (IBA)**


**Eric Lacey, Responsible Energy Codes Alliance (RECA)**


**Tracy Wilson, Sheet Metal Contractors Association (SMACNA)**

**Ron Ritchey, National Fire Sprinkler Association (NFSA)**

**Robert J. Koester, Ball State University**

**Jason Shelley, Indiana Chapter of American Institute of Architects (AIA Indiana)**

  
Justin Guedel, Staff Attorney  
Indiana Department of Homeland Security

  
Date:



August 7, 2017

The Honorable Eric Holcomb  
Governor of Indiana  
200 W. Washington St. Rm. 206  
Indianapolis, IN 46204

Subject: Re-adoption of 2010 Indiana Energy Conservation Code

Dear Governor Holcomb:

The North American Insulation Manufacturers Association (NAIMA) encourages you to support the re-adoption of the 2010 Indiana Energy Conservation Code. NAIMA advocates on behalf of North American manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation through the use of fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials.

NAIMA represents multiple companies with manufacturing facilities located across the state of Indiana. Owens Corning - Thermafiber, Inc. (Wabash, IN), Johns Manville (Richmond, IN), and Knauf Insulation (Shelbyville, IN) have all invested in Indiana. These businesses provide stable jobs in the state and produce insulation used in homes, businesses, and industrial facilities across the state and beyond.

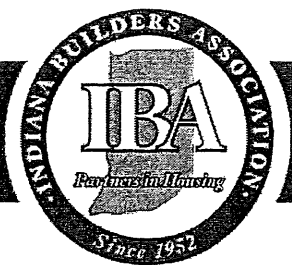
Energy efficiency – getting more from the energy that we use – is one of the top opportunities for helping households and businesses to save money and grow jobs. Energy codes are a cost-effective way to reduce current energy bills and employ energy efficiency measures to avoid costly retrofits in the future. The U.S. Department of Energy estimates that energy cost savings for maintaining the residential and commercial portions of the 2010 Indiana Energy Conservation Code to be nearly \$240 million annually by 2030. Considering the uncertainty of long-term energy costs, a sound energy code better ensures that Indiana is safeguarded against a potentially devastating economic hardship should energy costs rise considerably.

Thank you for your consideration of this recommendation and please do not hesitate to contact NAIMA should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be "Curt Rich", written over a horizontal line.

Curt Rich  
President and CEO



## Indiana Builders Association

September 14, 2017

Indiana Department of Homeland Security  
Code Services Section, Attn: Beth Sutor  
Indiana Government Center South  
302 W Washington St., Room E243  
Indianapolis, IN 46204

To Whom It May Concern:

Indiana Builders Association (IBA) supports LSA Document 16-329, the proposed rule to readopt 675 IAC 19-4 the 2010 Indiana Energy Conservation Code (IECC). Readoption of this rule maintains uniform, statewide requirements for energy efficiency in Class 1 structures, which include buildings and multi-family projects.

Our members have long supported proposals that are vetted through the state's code review process, are flexible and account for regional and climactic differences, and do not negatively affect affordability by providing less than cost-effective paybacks. The 2010 IECC meets this criteria.

IBA opposes efforts by product manufacturers, energy raters, and others to adopt a new energy code for Class 1 structures at this time as it would result in added costs to construction without added safety, and, in most cases, no reasonable payback to the home or business owner.

IBA supports initiatives that make homes and buildings safer and more energy-efficient while maintaining affordability. We respectfully request that the Indiana Fire Prevention and Building Safety Commission approve LSA Document 16-329.

Sincerely,

Carlie J. Hopper  
Governmental Affairs Director

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Indiana Builders Association (IBA) is a statewide trade organization representing Indiana's home building, remodeling and light commercial construction industry. Established in 1952, IBA has 25 local affiliates organized into eight geographic areas across Indiana. IBA and its affiliates are associated with the National Association of Home Builders. IBA works to educate its members, the general public, elected officials and regulatory bodies to maintain and develop workable and affordable regulations and laws that enable the citizens of Indiana to own a home.



August 11, 2017

The Honorable Eric Holcomb  
Governor of Indiana  
200 W. Washington St., Rm. 206  
Indianapolis, IN 46204

**RE: Supporting Comments for Proposed Extension of Indiana Energy Conservation Code**

Dear Governor Holcomb:

The Responsible Energy Codes Alliance (RECA) respectfully submits this letter in support of the Indiana Department of Homeland Security's proposal to re-adopt the Indiana Energy Conservation Code. A reasonable energy conservation code is an essential part of minimum statewide building codes and will help Indiana continue to meet its energy needs going forward.

RECA is a national coalition of energy efficiency professionals, regional organizations, product and equipment manufacturers, and trade associations that promote the adoption and implementation of improved building energy codes nationwide. A list of our members can be found on our website, [www.reca-codes.com](http://www.reca-codes.com). We are proud to have been a part of Indiana's process to adopt the 2010 Indiana Energy Conservation Code, and we hope that Indiana will remain committed to maintaining statewide energy conservation standards going forward.

The Indiana Energy Conservation Code has provided a minimum performance baseline for all commercial construction statewide since 2010, providing building owners and occupants with more efficient, more resilient buildings. The adoption of a statewide code has also provided uniform efficiency targets for design professionals, builders, tradespeople, manufacturers and retailers, who have been able to operate on a level playing field. The owners and occupants of buildings constructed since 2010 have come to expect that all new buildings meet certain standards of construction, including a minimum level of energy conservation.

Just last year, Governor Pence recognized the critical importance of statewide energy conservation standards and prevented the Indiana Energy Conservation Code from expiring by issuing Executive Order 16-08. However, that Order only extends the current codes until January 1, 2018, so we urge the Department of Homeland Security to take the necessary remaining steps to keep a statewide commercial energy code in place going



forward. To allow these important standards to expire could be extremely harmful to Indiana's economy. Unscrupulous developers could build unacceptably inefficient buildings to reduce short-term costs, while passing huge long-term energy costs and maintenance problems onto Indiana building owners and renters. Statewide minimum energy standards will help encourage fair competition and will help protect citizens against bad actors in the marketplace.

The benefits of efficient buildings are well-known, and will continue to pay dividends for owners and occupants for decades to come. We encourage your continued support for maintaining reasonable minimum standards for buildings, including an extension of the Indiana Energy Conservation Code before it expires.

Sincerely,

Eric Lacey,  
RECA Chairman

CC: Bryan J. Langley, Director, IDHS



**Sheet Metal Contractors Association**  
of Central Indiana and Fort Wayne Area

August 3, 2017

The Honorable Eric Holcomb  
Governor of Indiana  
200 W. Washington St., Rm. 206  
Indianapolis, IN 46204

Dear Governor Holcomb,

Respectfully, the Sheet Metal Contractors Association of Central Indiana (SMACNA) encourages you to support the re-adoption of the 2010 Indiana Energy Conservation Code.

The Indiana energy code sets a minimum standard for energy efficiency for buildings. The energy code is a cost-effective way to reduce energy bills and to employ energy efficiency measures that can be more expensive to implement through subsequent retrofits.

Energy cost savings for Indiana resulting from the state updating its commercial and residential building energy codes are estimated to be in the range of nearly \$240 million annually by 2030 according to the U.S. Department of Energy.

Furthermore, with the uncertainty of long-term energy costs, an energy code helps ensure that Indiana is safeguarded against a potentially-devastating economic hardship should energy costs rise considerably. Also, buildings held to a standard by an energy code support utility grid reliability and support making utility bills more predictable.

Again, Sheet Metal Contractors Association of Central Indiana encourages you to support the re-adoption of the 2010 Indiana Energy Conservation Code. Please do not hesitate to contact me if you have any questions.

Sincerely,

Tracy Wilson  
Executive Director







National Headquarters:  
514 Progress Drive, Suite A  
Linthicum Heights, MD 21090  
845-878-4200  
nfsa.org

September 14, 2017

**NFSA public comments in support of proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code**

Mr. Chairman and members of the Fire Prevention and Building Safety Commission,

My name is Ron Ritchey, and I serve as the Great Lakes Regional Manager for the National Fire Sprinkler Association (NFSA) and serve the State of Indiana and surrounding states of Kentucky, Ohio, and Michigan. The National Fire Sprinkler Association has been in existence for over 110 years and our membership includes fire and building code officials, sprinkler contractor and manufacturers, and building design professionals.

We respectfully request you to re-adopt proposed rule 675 IAC 19-4, the 2010 Indiana Energy Conservation Code which is set to expire at the end of the calendar year. The proposed rule provides minimum requirements for the energy-efficient design of Class 1 structures, which include important insulation requirements that play an integral part in keeping commercial buildings protected with a water-based fire sprinkler system in a properly conditioned environment when temperatures drop below freezing.

No additional costs or negative fiscal impact will be imposed by this rule if adopted which essentially will keep the current code statutory requirements in place with no additional requirements.

NFSA urges you to not allow the current energy code to expire which would cause devastating and negative effects upon the citizens of our State and we strongly support the re-adoption of the 2010 Indiana Energy Conservation Code. If the Commission needs any additional information or has any questions, please do not hesitate to contact me.

Ron Ritchey, NFSA  
Great Lakes Regional Manager  
3311 Dover Court  
Lafayette, Indiana 47909  
Phone- 765.412.6707  
Email- [ritchey@nfsa.org](mailto:ritchey@nfsa.org)



ACADEMIC AFFAIRS  
CENTER FOR ENERGY RESEARCH/EDUCATION/SERVICE

Muncie, Indiana 47306-0170  
Phone: 765-285-1135  
Fax: 765-285-5622

August 8, 2017

The Honorable Eric Holcomb  
Governor of Indiana  
200 W. Washington St., Rm. 206  
Indianapolis, IN 46204

Dear Governor Holcomb:

As you will recall, Governor Pence signed Executive Order 16-08 (just before leaving office) to extend statewide use of the 2010 Indiana Energy Conservation Code (for one year).

The time is at hand to renew that commitment.

With your leadership, the state can extend the opportunity for significant cost savings to our citizenry. According to the US Department of Energy, energy cost savings for Indiana resulting from maintaining this building energy code would be upwards of \$240 million annually by 2030.

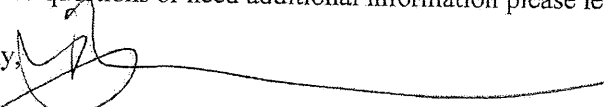
Numerous other affirmations can be put forward, many of which I'm sure you are well aware; namely:

- low income households will continue to benefit from lower costs associated with well-insulated building upgrades,
- citizens of all income levels will avoid the health issues arising from moisture-driven mold buildup in poorly insulated buildings,
- collectively we will avoid the fire hazards associated with the use of space heaters to compensate for poorly insulated buildings,
- a building stock which adheres to the conservation code will have more value in the marketplace, and finally
- this will assure our citizenry of avoiding future hardships should energy costs rise.

I am hopeful that you will continue to position Indiana as first among equals in the Midwestern region and that the extension of the 2010 Energy Conservation Code would be granted for more than just one additional year. Our shared future is dependent on your leadership.

If you have questions or need additional information please let me know.

Sincerely,



Robert J. Koester AIA, LEED AP  
Professor of Architecture  
Director, Center for Energy Research/Education/Service  
Chair, Council on the Environment



# AIA Indiana

August 1, 2017

The Honorable Eric Holcomb  
Governor of Indiana  
200 W. Washington St., Rm. 206  
Indianapolis, IN 46204

Dear Governor Holcomb:

With respect, the Indiana Chapter of American Institute of Architects (AIA Indiana) encourages you to support the re-adoption of the 2010 Indiana Energy Conservation Code. Just last year Governor Pence, in one of his final acts in office, granted a 1-year extension of the 2010 Indiana Energy Conservation Code through Executive Order 16-08 in order to make the re-adoption of this code possible. Please note, Indiana would be the only state in the region (Ohio, Kentucky, Illinois, and Michigan) without an energy code if it's not re-adopted.

The energy code sets a minimum standard for energy efficiency for buildings that ensures reduced energy usage and reduced utility bills – which puts money back into individuals' and companies' pockets. According to the U.S. Department of Energy, energy cost savings for Indiana resulting from the state maintaining its commercial and residential building energy codes are estimated to be upwards of \$240 million annually by 2030. Considering the uncertainty of long-term energy costs, an energy code better ensures the state is safeguarded against a potentially-devastating economic hardship should energy costs rise considerably.

Furthermore, as the expiration of the energy code would eliminate all requirements for buildings to be insulated; AIA Indiana is gravely concerned about the potential for health issues arising from moisture and mold, as well as potential fire hazards resulting from space heaters used to compensate for the uneven temperatures common to uninsulated buildings.

AIA Indiana considers our energy code to be a net benefit to Hoosiers economically, as well as a safeguard to the lives of Hoosiers everywhere, and again encourages you to support the re-adoption of the 2010 Indiana Energy Conservation Code. Please do not hesitate to contact me if you have any questions.

Sincerely,

Jason Shelley  
Executive Director

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