



Tuesday, May 22, 2018

Representative Brandt Iden, Chairperson  
House Regulatory Reform Committee  
124 North Capitol Ave  
Lansing, MI 48933

**HB 5376: MEEA Comments on the formation of a Building Codes Advisory Committee**

Dear Representative Iden,

Thank you for the opportunity to comment on HB 5376. My name is Ian Blanding and I am the Sr. Building Policy Associate for the Midwest Energy Efficiency Alliance (MEEA). As the Midwest's principal proponent and resource for energy efficiency policy, MEEA helps to educate and advise a diverse set of stakeholders on meaningful ways to reduce energy waste that are both achievable and cost effective. With an emphasis on strengthening utility sector policies, updating building codes and serving as a champion for energy efficiency, we support innovative programs and policies that capture the full range of energy efficiency benefits and increase potential energy savings. We partner with similarly aligned stakeholders to identify opportunities critical to ensuring that states, utilities and businesses adopt policies that maximize investment in the most cost-effective energy supply.

HB 5376 creates advisory committees to assist with the technical review and adoption of new statewide building codes. One requirement for these committees during their review is to conduct a financial impact analysis of each code revision or amendment during the review process of new statewide building codes in Michigan. Although we agree that an analysis of the financial impact to the consumer is necessary, the language included is vague and does not provide concrete parameters with which to conduct this analysis. Lastly, when considering an update to the statewide residential and commercial energy code, first costs should not be the only consideration as energy codes save consumers money and provide significant energy and cost savings over the life of the building. As such, the long-term energy savings associated with an update should be considered in any financial impact analysis.

Additionally, the makeup of the committees referenced in HB 5376 is not appropriately balanced. Essential representatives including homeowners, and consumer rights and energy efficiency experts, and product manufacturers are absent from the advisory committees for the International Residential Code (IRC) and the commercial chapter of the International Energy Conservation Code. MEEA strongly suggests consideration of these representatives on these committees, as they provide an important perspective and a greater level of expertise when considering new statewide building codes.

Building codes are designed to provide protections to building owners and renters for the life of a building, which includes the long-term operational costs in addition to the initial sale price. For this reason, it is very important to include an energy efficiency and consumer rights expert on

these committees as they can speak to the long-term cost-effectiveness and consumer benefits of an update. Additionally, buildings are a system and include many components which need to be appropriately integrated in order to maintain quality building practices and not cause undue harm or long-term maintenance issues. Building product experts can provide important insight on building product interactions during the code adoption process. These voices, along with representation from homeowners, are essential in creating a comprehensive and robust review committee to ensure that effective building codes with the best interest of the public are adopted.

If Michigan were to include homeowners and energy efficiency, consumer rights, and manufacturer representatives in the IRC and IECC committees, they would follow other successful models in states which include (but are not limited to) Minnesota, Florida, Georgia and Utah. Some states require separate technical advisory groups (TAGs) that provide direct input to the overall council, such as Minnesota, whose Energy TAG consists of at least one energy efficiency representative. Advisory committees in Georgia and Florida both contain members that help protect consumers; Georgia has a representative from the Georgia Environmental Finance Authority and the Georgia Apartment Association; Florida contains a green building professional, a member of the insurance industry, a representative of persons with disabilities, and a representative of public education. Utah's committee requires two members of the general public, which could include a homeowner, energy efficiency or a consumer's right representative.

Below are hyperlinks to the members of the state councils mentioned above.

[Georgia](#)

[Florida](#)

[Maine](#)

[Utah](#)

[Minnesota](#)

Thank you for the opportunity to comment. MEEA has considerable expertise in building energy codes and are more than willing to provide additional research or technical assistance as needed. If you have any questions about this testimony, example committees, or other noted references, please contact Ian Blanding, Sr. Building Policy Associate for MEEA at [iblanding@mwalliance.org](mailto:iblanding@mwalliance.org) or 312-784-7269.

Sincerely,

Ian Blanding  
Sr. Building Policy Associate