

2024 IECC – Significant Potential Efficiency Rollbacks

The EECC has identified key residential and commercial proposals that would significantly reduce efficiency as compared to the 2021 IECC.

The summary below is not a complete list of proposals that may negatively impact energy conservation, but it is intended as a priority list of proposals that should be disapproved as unacceptable rollbacks by the IECC-Residential and Commercial Consensus Committees and relevant subcommittees. Over the past several IECC updates, the committees and governmental member voting representatives have consistently rejected rollbacks, safeguarding the integrity of the energy code and the code development process. Several of these proposed rollbacks have been previously proposed by the same or similar parties and have been rejected multiple times by Code Development Committees and disapproved by ICC Governmental Member Voting Representatives over multiple code update cycles. All of them directly conflict with the IECC Intent (C101.3 and R101.3) to increase energy savings with each new edition of the IECC, as well as ICC’s public commitment to not allow rollbacks. The summaries and recommendations below reflect EECC’s views at this time and may be updated as proposals evolve or as additional rollback proposals are submitted.

This document is not intended as a substitute for reviewing the actual proposals published by ICC, and we encourage a full review.

Prop #	Description	Comments
Efficiency Reductions in Performance Path		
REPI-122 , REPI-123	Establishes trade-off credit for heating, cooling, and water heating efficiency in residential performance path.	Rollback. Introduces unwarranted trade-off credits into the performance path (that have not been in the IECC since 2006) and allows huge reductions in overall efficiency. Setting the standard reference design assumption at the outdated federal minimum efficiencies for this equipment creates enormous free-ridership issues given widespread use of much higher-efficiency equipment. Efficiency of permanent envelope and other measures should not be traded away against shorter-term efficiency of equipment. Similar proposals have been consistently rejected at ICC and the vast majority of states multiple times over the last decade. A similar proposal for the 2021 IECC (RE176-19) was rejected by the Committee and disapproved by 91% of voters.

REPI-116	Establishes trade-off credit for on-site renewable energy in residential performance path; revises thermal envelope backstop from 2009 IECC to 2012 IECC for homes without on-site renewable energy, or 2015 IECC where on-site renewable energy is installed.	Rollback. Would allow homes with on-site renewable energy to replace efficiency with renewable energy down to mandatory limits, including a thermal envelope at 2015 IECC levels. Unnecessary trade-off given other compliance options better suited to handle renewable issues (ERI and Appx RC) and better proposals in this cycle to address renewable energy issues. A similar proposal for the 2021 IECC (RE156-19) was rejected by the Code Development Committee and disapproved by 94% of voters.
CEPI-205	(Commercial) Increases cap on performance path credit for on-site renewable energy from 5% to 15%; allows efficiency credit for community solar and off-site renewable energy.	Rollback. This proposal would allow increased trade-offs between on-site generation and energy conservation measures and unnecessarily expand such trade-offs to off-site generation. This is especially problematic because the commercial performance path already allows trade-offs for a wide range of measures and has no backstops to protect the critical building thermal envelope.
Efficiency Reductions in Base Code Requirements		
REPI-167	Reverses residential insulation improvements adopted in the 2021 IECC for walls and ceilings; substantially revises additional efficiency requirements; exempts ERI path from compliance with additional efficiency; modifies percentage improvement required in performance path.	Rollback. Eliminates multiple efficiency improvements incorporated in the 2021 IECC and significantly reduces the overall efficiency of the code.
REPI-33	Removes all wall, ceiling, and slab insulation improvements adopted in the 2021 IECC residential prescriptive tables and replaces Additional Efficiency Options table with less-stringent set of options.	Rollback. Eliminates multiple efficiency improvements incorporated in the 2021 IECC and significantly reduces the overall efficiency of the code.
REPI-61, REPI-85, REPI-97	Allows the use of sampling when testing R2 multifamily units for air leakage (REPI-61), duct leakage (REPI-85), and mechanical ventilation flow rate (REPI-97) instead of requiring that each dwelling unit be tested.	Rollback. Sampling is not an effective means of demonstrating compliance in every building. The residential IECC has never allowed sampling to comply with residential envelope or mechanical system testing requirements, and similar proposals (RE43-19, RE95-19, RE121-19) were all disapproved in the 2021 IECC cycle by over 93% of voters.
Efficiency Reductions in Energy Rating Index		
REPI-23	Reduces ERI efficiency by 5%; adopts a single thermal envelope backstop based on 2018 IECC for rated homes with or without on-site power production; removes 5% limitation on credit for on-site power production; modifies ventilation rate assumption.	Rollback. Eliminates several key efficiency measures related to the ERI incorporated into the 2021 IECC or earlier versions and substantially reduces the stringency of the ERI path.
REPI-126	Substantially revises ERI sections; eliminates both thermal envelope backstops; divides ERI score table into two columns of ERI scores	Rollback. Eliminates several key efficiency improvements incorporated into 2021 IECC or earlier versions and reduces the stringency of the

	based on whether on-site power is included; modifies ventilation rate assumption; deletes 5% limitation on credit for on-site renewables.	ERI path. Elimination of the ERI thermal envelope backstops would result in poor long-term performance in buildings.
REPI-21 , REPI-22	Reduces ERI efficiency by 5%.	Rollback. Reduces the efficiency of the ERI path.
REPI-131 , REPI-132	Revises ventilation rate or air exchange rate in ERI.	Rollback. It is estimated that this would have the impact of reducing the stringency of the ERI compliance path by several points.
REPI-127	Adds option to comply with ERI by comparing proposed building to an ERI based on the standard reference design in performance path instead of ERI score listed in R406.	Rollback. It is unclear how this compliance path would actually work, but it appears to establish an unnecessary additional, less stringent code compliance path alternative to the current ERI.
REPI-133 P1 , REPI-134	Removes 5% cap on credit for on-site power production in ERI calculations.	Rollback. Eliminates a significant efficiency protection incorporated into 2021 IECC and would allow unlimited efficiency trade-offs in rated homes with on-site renewable energy.
REPI-128 , REPI-130	Deletes enhanced thermal envelope backstop for ERI-rated homes with on-site power production.	Rollback. Eliminates a significant efficiency improvement incorporated into the 2018 and 2021 versions of the IECC and allows significant reduction in envelope efficiency in rated homes by allowing a trade-off with on-site renewable energy.
Alternative Compliance Options that Create Loopholes		
REPI-16	Creates a standalone compliance path based on Btu/hour heating and cooling loads with no minimum envelope backstops; based on proposal RE17-19 from the previous cycle.	Rollback. Creates a new standalone compliance option that could substantially reduce efficiency in new buildings. Has not been technically justified and will not produce building performance, comfort, and energy efficiency at least as robust as buildings subject to current code requirements. Approach to compliance and verification is also unclear. Proposed alternative path does not require that building meet code mandatory minimums or envelope backstops. Original proposal was withdrawn by proponent in previous cycle.
REPI-3	Creates alternative compliance option for homes complying with National Green Building Standard or LEED for Homes.	Rollback. IECC section R102.1.1 already permits above-code programs that meet the requirements of the section to be approved by a code official. However, this proposal avoids the minimum thermal envelope and mandatory requirements that are required under section R102.1.1 and specifically designates two alternatives that have not been shown to be at least as stringent as the IECC and which permit substantially more trade-offs than are allowed in the IECC. Identifying specific programs as “above-code” is best left to the code official; designating various favored programs in the IECC would be bad policy.

REPI-168	<p>Creates a shorter version of the residential energy code in a new appendix; eliminates trade-off backstops; allows renewables as trade-off against efficiency measures; adds equipment efficiency requirements; adjusts duct testing and other requirements.</p>	<p>Rollback. Introduces equipment efficiency and renewable energy trade-offs (which would substantially reduce efficiency and are not permitted by the current code) with no limitations; eliminates multiple mandatory measures and trade-off backstops, etc. These trade-offs have been consistently rejected by Code Development Committees and disapproved by voters for several cycles.</p>
CEPI-255 P1, CEPI-255-P2	<p>Creates new "Above Base Code" appendix that deems projects complying with ICC-700 or IgCC to comply with the IECC; establishes framework for appendix not yet completely filled in.</p>	<p>Rollback. IECC sections R102.1.1 and C102.1.1 already permit above-code programs that meet the requirements of these sections to be approved by a code official. However, unlike these sections, this proposal avoids minimum mandatory requirements and specifically recognizes two programs that have not been shown to be at least as stringent as the IECC and which lack basic mandatory minimum requirements. Identifying specific programs as “above-code” is best left to the code official; designating various favored programs in the IECC would be bad policy.</p>
<p>Efficiency Reductions in Existing Building Provisions (Residential and Commercial)</p>		
CEPI-224, REPI-149	<p>Adds new exception to code requirements for alterations for roof membrane peel and replacement.</p>	<p>Rollback. Would exempt certain roof replacements from the current code requirements.</p>
REPI-146, REPI-147, CEPI-222, CEPI-223	<p>Adds new exception to requirements for roof replacements where meeting specified R-values is infeasible or an exception for “maximum practical compliance”.</p>	<p>Rollback. Introduces a potentially large exception from roof replacement requirements. A similar proposal in the 2021 Code Development Process (CE256-19) was rejected by the Code Development Committee and disapproved by 96% of voters.</p>