



Shaping Tomorrow's  
Built Environment Today

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October 7, 2019

Mr. Billy Pope  
Chief Executive Officer  
Oklahoma Uniform Building Code Commission  
2401 23<sup>rd</sup>, Suite 2F  
Oklahoma City, OK 73107

Dear Members of the Oklahoma Uniform Building Code Commission:

Thank you for the important work you are doing to ensure buildings in Oklahoma are safe and healthy. I hope you will consider updating the state building codes to ensure efficient operations, which can result in tremendous cost savings for building owners. As ASHRAE President, I am writing to specifically urge the Oklahoma Building Code Commission to update its building energy codes. The state is currently using an edition of the International Energy Conservation Code (IECC) that is over a decade old. The updated 2018 version, of which ANSI/ASHRAE/IES Standard 90.1-2016 is an alternative compliance pathway for commercial buildings, should be seriously considered in your deliberations.

ASHRAE, founded in 1894, is a technical society advancing human well-being through sustainable technology for the built environment. The Society has more than 57,000 individual members worldwide, including over 500 in Oklahoma, focused 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. ANSI/ASHRAE/IES Standard 90.1 ("Standard 90.1), Energy Standard for Buildings Except Low-Rise Residential Buildings, has been a benchmark for commercial energy codes in the United States and a key basis for codes and standards around the world for more than 35 years.

While the Oklahoma Uniform Building Code Commission (OUBCC) voted last year to review the 2018 versions of the IBC, IEBC, IFC, IFGC, IMC and the IPC, the exclusion of energy building code updates will result in unnecessary energy usage and elevated costs for Oklahoma residents. It is also important for you to be aware that the software for compliance verification (COMcheck)

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only supports the latest three energy codes, in this case the 2018, 2015, and 2012 versions of the IECC and the 2016, 2013, and 2010 versions of Standard 90.1, meaning Oklahoma's codes will no longer be compatible with software supported by the U.S. Department of Energy.

Further, ASHRAE's most recently published Standard 90.1-2016, which is a compliance pathway in the 2018 IECC, has made incremental changes over the past decade leading to buildings using less energy, clarified confusing/incorrect text/requirements, and saving money for building owners and occupants. According to DOE<sup>1</sup>, buildings built to meet Standard 90.1-2016 will save approximately 34% more energy than similar buildings built to meet Standard 90.1-2004. These efficiency increases have been determined to be cost effective by both the U.S. DOE and the ASHRAE committee responsible for writing and maintaining Standard 90.1.

ASHRAE would be happy to assist you in updating your building energy codes, and answering any questions you might have, including how the state could implement an updated version of ASHRAE Standard 90.1. If you have any questions or would like further information, please contact us at [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org). ASHRAE members stand ready to work with the OUBCC and we hope to hear from you soon.

Sincerely,

A handwritten signature in black ink, appearing to read "Darryl Boyce". The signature is fluid and cursive, with a horizontal line underlining the name.

Darryl Boyce, P. Eng., FASHRAE  
ASHRAE President, SY2019 – 20

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<sup>1</sup> <https://www.regulations.gov/document?D=EERE-2017-BT-DET-0046-0008>