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Bill McQuade
ASHRAE Society President, 2025-2026

November 10, 2025

The Honorable Governor Tony Evers The Honorable Secretary Karen Hyun 2 East Main St Madison, WI 53707

Re: Assembly Bill 450 and Senate Bill 475 "Relating to: applicability of the commercial building code to certain buildings."

Dear Governor Evers and Secretary Hyun:

I am writing on behalf of ASHRAE, the American Society of Heating Refrigerating, and Air Conditioning Engineers. ASHRAE, founded in 1894, is a global professional society of more than 54,000 members, including more than 900 in Wisconsin, that focuses on building systems, energy efficiency, indoor air quality, resiliency, and sustainability. Through our research, standards writing, publishing, certification, and continuing education, ASHRAE shapes tomorrow's built environment today.

On behalf of our membership in Wisconsin, we wish to express our opposition to WI AB 450 and WI SB 475. We respectfully urge you to veto this legislation when it reaches your desk.

Wisconsin ASHRAE members testified in 2023 in support of the state's commercial energy code update, met with dozens of lawmakers, and worked to educate stakeholders on the many benefits of updating to a more modern set of building codes and standards. This effort was unsuccessful, and it took legal action to eventually get these commonsense modernization efforts across the finish line. However, that progress is now in danger.

Companion bills WI AB 450 and WI SB 475 would exempt developers from complying with the state's new updated commercial building code, including energy efficiency provisions, until well into 2026.

Wisconsin's updated commercial building code's energy provisions are based on ASHRAE Standard 90.1-2019 *Energy Standard for Buildings Except Low-Rise Residential Buildings*. This standard, created through a consensus process, sets minimum energy efficiency requirements for commercial buildings. The energy savings gained by building to this modern standard will improve grid stability and help offset the energy demands of data centers.

Delaying compliance would not only increase energy use (which already has strained capacity), it would also impose long-term economic costs on Wisconsin residents. The state imports nearly all its heating fuels, so every inefficient building effectively sends energy dollars out of state. Conversely, energy-efficient construction keeps

money in Wisconsin communities, driving local investment and job growth. The use of a modern edition of ASHRAE's energy standard is expected to save building owners and residents over \$343 million over the next 30 years.¹

Buildings last decades, and the efficiency decisions made during construction determine their lifetime performance. Allowing a broad exemption from Wisconsin's updated code would lock in higher energy use and costs for generations, undermining the state's economic and environmental goals.

For these reasons, and on behalf of our more than 900 members in Wisconsin, we respectfully urge you to veto Assembly Bill 450 and Senate Bill 475. We appreciate your continued leadership in promoting a safe, efficient, and economically competitive Wisconsin, and we stand ready to assist your administration in achieving those shared goals.

Thank you for your consideration of ASHRAE's comments.

Sincerely,

Bill McQuade

ASHRAE Society President, 2025-2026

 $^{^1\,}https://www.energycodes.gov/sites/default/files/2021-07/Cost-effectiveness_of_ASHRAE_Standard_90-1-2019-Wisconsin.pdf$