

September 16, 2021

## **Commercial Building Code Council**

Wisconsin Department of Safety and Professional Services 4822 Madison Yards Way PO Box 8366 Madison, WI 53705

Letter sent via email to: <a href="mailto:dsps@wisconsin.gov">dsps@wisconsin.gov</a>

Re: Rulemaking SPS 361-366, Updates to Wisconsin Commercial Building Code

Dear Members of the Commercial Building Code Council:

The Wisconsin Chapters of ASHRAE are writing regarding the proposed updates to the commercial building code. ASHRAE supports adoption of the most up-to-date energy standards in state law and we appreciate that Wisconsin is moving forward with updates. Specifically, we support the adoption by the State of Wisconsin of the 2021 IECC code and ASHRAE Standard 90.1-2019 without amendments.

Standard 90.1-2019 is the alternative compliance pathway for the 2021 IECC according to section C401.2 (Application). Adopting Standard 90.1-2019 will result in energy savings and lower operational costs. For buildings in Wisconsin, this would amount to an estimated \$3,472 per thousand square feet of space for private buildings, and \$3,990 per thousand square feet of space for public buildings over 30 years. These savings are calculated based on the present value of energy savings for a building built under the updated code without amendments compared to the previous code. Adopting the latest energy standard in Wisconsin is estimated to reduce statewide greenhouse gas emissions by over 9 million metric tons. This is the equivalent to taking 2 million passenger vehicles off roads or eliminating greenhouse gas emissions from 2.3 coal power plants or 1.1 million homes.

ANSI/ASHRAE/IES Standard 90.1, Energy Standard for Buildings Except Low-Rise Residential Buildings, has been the benchmark for commercial building energy codes in the United States and a key basis for codes and standards around the world for more than 35 years. It is an indispensable reference for engineers and other professionals involved in design of buildings and building systems. The 2019 edition of Standard 90.1 includes significant updates and clarifications to previous editions. These include changes to the requirements for administration and enforcement, the building envelope, the lighting, mechanical, and energy cost budget sections, and the performance rating method.

ASHRAE, founded in 1894, is a technical and professional society of more than 50,000 members, including over 900 in Wisconsin, that 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.

Thank you for working to update the State of Wisconsin's building energy codes. These updates will benefit the people of Wisconsin and result in a more sustainable built environment. If you have any questions or need additional information, please feel free to contact <a href="mailto:GovAffairs@ashrae.org">GovAffairs@ashrae.org</a>. Thank you for your work to improve building performance and improve the lives of Wisconsin residents.

Sincerely,

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