



## Shaping Tomorrow's Built Environment Today

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2023-2024 ASHRAE President

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February 8, 2024

The Honorable Donovan Dela Cruz  
The Honorable Sharon Moriwaki  
Senate Committee on Ways and Means  
Hawai'i State Capitol  
415 South Beretania St.  
Honolulu, HI 96813

*Letter sent via email to:*

[sendelacruz@capitol.hawaii.gov](mailto:sendelacruz@capitol.hawaii.gov)  
[senmoriwaki@capitol.hawaii.gov](mailto:senmoriwaki@capitol.hawaii.gov)

Re: Senate Bill 2030 "Relating to the State Building Code Council"

Dear Chair Dela Cruz and Vice Chair Moriwaki:

I am writing on behalf of ASHRAE, the American Society of Heating Refrigerating, and Air Conditioning Engineers, to **oppose Hawai'i Senate Bill 2030**, titled "Relating to the State Building Code Council" that sits before you in the Senate Committee on Ways and Means. ASHRAE, founded in 1894, is a global professional society of more than 53,000 members, including more than 250 in Hawai'i, 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.

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. Hawai'i adopts and enforces the 2016 edition of this standard. Updating to the 2019 edition would save Hawai'i's residents over half a million dollars in reduced energy bills and mitigate 1,848 metric tons of emissions in the first year after adoption and would save over \$280,000,000 and mitigate 1,330,000 tons of emissions in the state over a 30 year period.<sup>1</sup>

While well intentioned, as we certainly sympathize with the stated goal of bringing down housing costs in Hawai'i, we believe that this legislation will weaken any future attempts to update the energy codes and standards without actually bringing down housing costs. This will in turn cause energy efficiency gains to be left on the table in HI, burden business owners, homeowners and tenants with higher utility bills, and result in thousands of tons of needlessly unmitigated greenhouse gas emissions. There are two separate but complementary reasons why we believe this to be the case.

Firstly, the Hawai'i Building Codes Council is under resourced. They currently struggle to fulfil their duties and they lack the administrative and financial support that they are empowered by statute to receive. Adding additional administrative

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<sup>1</sup> [https://www.energycodes.gov/sites/default/files/2021-07/Cost-effectiveness\\_of\\_ASHRAE\\_Standard\\_90-1-2019-Hawaii.pdf](https://www.energycodes.gov/sites/default/files/2021-07/Cost-effectiveness_of_ASHRAE_Standard_90-1-2019-Hawaii.pdf)

requirements, such as the consultation and written reporting that this bill requires, to their workload will serve as a de facto barrier on future code and standard adoption.

Secondly, requiring cost/benefit analysis consultation with developers, contractors, and builders, and requiring the inclusion of a report from the same groups regarding code and standard updates is a departure from the current balanced and fair process. Privileging the voices of one coalition in this complex process could throw future energy standard updates into jeopardy. An amendment requiring additional consultation with energy efficiency advocates and building science organizations such as ASHRAE would help the Council remain balanced but would still impose burdensome administrative work on the group.

We also wish to inform you that rigorous studies on the financial and environmental impact of energy code and standard adoption are already produced by the United States Department of Energy and the Pacific Northwest National Laboratory. These reports are an unbiased, science-based analysis of the costs and benefits of updating Hawai'i's energy codes and standards. The two most relevant reports for your attention are:

- [Cost-Effectiveness of ANSI/ASHRAE/IES Standard 90.1-2019 for Hawaii](#): this study shows the costs and benefits of updating the state's commercial building energy code. In summary, no increase in construction costs are expected.
- [Cost-Effectiveness of the 2021 IECC for Residential Buildings for Hawaii](#): this study shows the costs and benefits of updating the state's residential building energy code. In summary, home owners can expect to be cashflow positive inside the first year.

Timely updates to energy efficiency codes and standards create massive cost savings for business owners, homeowners, and tenants, while also mitigating greenhouse gas emissions and creating jobs. Building energy efficiency is also an important component of Hawai'i's 2030 and 2045 climate goals. If, as we expect, this legislation would result in fewer updates to Hawai'i's energy codes and more weakening amendments, this legislation is not in the best interests of the state's economy, environment, or residents.

On behalf of our more than 250 members in Hawai'i, thank you for your consideration of ASHRAE's comments in opposition to SB 2030.

Sincerely,



Ginger Scoggins  
ASHRAE President



Justin Choriki  
ASHRAE Hawai'i Chapter President



Kevin Luoma  
ASHRAE Hawai'i Chapter Government Affairs Chair