Shaping Tomorrow's Global Built Environment Today

180 Technology Parkway, NW • Peachtree Corners, GA 30092-2977 • Tel: 404.636.8400 • Fax: 404.321.5478
www.ashrae.org

Bill McQuade
ASHRAE Society President, 2025-2026

Phone: (240) 761-5453
Email: bmcquade@baltimoreaircoil.com

January 5, 2025

Mr. Jonathan Sanchez
Contract Manager
Texas Comptroller of Public Accounts
State Energy Conservation Office (SECO)
111 East 17th Street, 610D
Austin, TX 78701

Re: RFI No. 240i, Request for Information for a High-Performance Building Evaluation System and Energy Efficiency Performance Standard for State Agencies and Higher Education Facilities Design and Renovation Projects

Sent via email to: Jonathan.Sanchez@cpa.texas.gov

Dear Mr. Sanchez:

Thank you for the opportunity to provide input on the November 20, 2025 Request for Information (RFI) issued by the Texas State Energy Conservation Office (SECO) for High-Performance Building Evaluation System and Energy Efficiency Performance Standard for State Agencies and Higher Education Facilities Design and Renovation Projects. ASHRAE is responding to SECO's request to "assist SECO in determining if the IgCC-2024 meets the requirements set forth in Section 447.004(b-1) of the Texas Government Code and if ASHRAE 90.1-2022 should be the new energy efficiency performance standard."

ASHRAE recommends SECO adopt both the International Green Construction Code (IgCC) 2024, and ANSI/ASHRAE/IES Standard 90.1-2022, *Energy Efficiency in Sites and Buildings Except Low-Rise Residential Buildings.*

ASHRAE, founded in 1894, is a professional and technical society of more than 54,000 members, including over 2,700 in Texas, who focus on building systems, energy efficiency, indoor air quality, refrigeration and resiliency within the built environment. Through research, standards development, publishing, certification and continuing education, ASHRAE shapes

tomorrow's global built environment today. ASHRAE is actively engaged in the development of robust, voluntary, consensus-based standards for the built environment that focus on heating, ventilating, air-conditioning, and refrigeration.

International Green Construction Code (IgCC) 2024, Powered by ANSI/ASHRAE/ICC/USGBC/IES Standard 189.1-2023, *Standard for the Design of High-Performance Green Buildings*.

The IgCC is a model code providing a whole systems approach to the design, construction and operation of commercial buildings, including state buildings and state-funded institutions of higher education. The IgCC contains measures that result in better indoor environments, lower impact on natural resources, better neighborhood connections, and improved walkability. It provides adoptable code language for communities to go beyond the requirements contained in other model codes and standards to create high-performance, sustainable buildings. Its model code regulations contain clear and specific requirements with provisions that promote safe and sustainable construction in an integrated fashion with the ICC Family of Codes and related ASHRAE Standards.

The IgCC provides total sustainability guidance for designing, building, renovating, and operating high-performance green buildings. From site location to energy use to recycling, this code sets the foundation for green buildings by addressing site sustainability, water use efficiency, energy efficiency, indoor environmental quality, and materials and resources.

The 2023 edition of Standard 189.1 serves as the technical content of the 2024 IgCC. ASHRAE Standard 189.1 is written in code-intended (mandatory and enforceable) language so that it may be referenced or adopted by enforcement authorities as the minimum acceptable design criteria within their jurisdiction.

Per SECO's request for assistance in determining if the IgCC meets the requirements in Texas Government Code 447.004 (b-1), please see ASHRAE's responses to the specific provisions below:

> *"A building to which this section applies must be designed and constructed or renovated so that the building achieves certification under any high-performance design evaluation system approved by the state energy conservation office and,*
> *(1) is developed and revised through a nationally recognized consensus-based process or by a municipally owned utility in this state;*
>
> Standard 189.1, the technical content of the IgCC, follows the American National Standards Institute (ANSI) procedures for standards development, including transparency, balanced membership of interest areas, consensus process, public comment process, and an appeals process. ASHRAE is one of only seven standards-developing organizations in the U.S. that can self-certify that its standards have followed procedures established by ANSI. ASHRAE's voluntary consensus standards are developed through the participation of any and all interested and affected stakeholders, including manufacturers, consumers, users, advocacy organizations, and representatives of government and academia. Standard 189.1 is under continuous maintenance to stay current with technology and practice and follows a three-year publication cycle.

(2) provides minimum requirements for energy use, natural resources use, and indoor air quality;

The purpose or intent of the IgCC is to provide minimum requirements for the siting, design, construction, and plans for operation of high-performance green buildings to reduce energy use and emissions, enhance occupant health and comfort, conserve water, protect local biodiversity and ecosystem services, promote sustainable and regenerative materials cycles, and enhance resilience.

IgCC Chapter 7, Energy Efficiency, references ANSI/ASHRAE/IES Standard 90.1-2022 and contains many provisions that exceed those in Standard 90.1 for higher performance and efficiency. Appendix G is an alternative prescriptive energy compliance path that is built on the prescriptive provisions of the IECC as the baseline for Chapter 7.

Site Sustainability provisions are contained within Chapter 5, Water Use Efficiency provisions are contained within Chapter 6, Indoor Environmental Quality provisions (including air quality) are contained within Chapter 8, and provisions for Materials and Resources are contained within Chapter 9.

(3) requires substantiating documentation for certification;

Documentation and submission provisions are included for each requirement within the IgCC. The IgCC contains jurisdictional options for selected provisions to provide jurisdictions the flexibility to adopt the code in a manner that is best suited to meet their unique environmental and regional goals and needs.

(4) requires on-site, third-party, post-construction review and verification for certification, or a third-party, post-construction, rigorous review of documentation and verification for certification;

The IgCC is written to provide the authority having jurisdiction with the ability to verify each of the requirements. This responsibility is typically held by staff within the jurisdiction, or by third-party providers identified by the jurisdiction. The IgCC aligns closely with common categories and issues included in multiple green building rating systems.

The authority having jurisdiction is authorized to enforce the provisions of this code. This could include appointing technical officers, inspectors and other employees as necessary. Typically, the authority having jurisdiction enforces compliance with the provisions of the code as part of the enforcement of other applicable codes and regulations.

(5) encourages the use of materials or products manufactured or produced in this state."

Chapter 9 of the IgCC addresses Materials and Resources and includes a section on Regional Materials, in which a portion of the materials must be

extracted/harvested/recovered or manufactured within a radius of 500 miles of the building project.

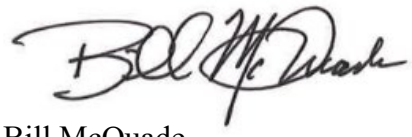
ANSI/ASHRAE/IES Standard 90.1-2022, *Energy Efficiency in Sites and Buildings Except Low-Rise Residential Buildings*

ASHRAE Standard 90.1 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. ASHRAE Standard 90.1 is under continuous maintenance by the 90.1 Standard Project Committee, and energy performance has improved in each successive edition, resulting in major improvements over time. Over the period of 2004-2019, which included six editions of Standard 90.1, energy performance improved by 36%. The U.S. Department of Energy (DOE) has issued a determination that ASHRAE Standard 90.1- 2022 will achieve greater energy efficiency in commercial buildings subject to the code, as compared to the previous 2019 edition of the standard. The determination estimates savings for commercial buildings of approximately 9.8% in site energy and 9.4% in source energy, along with an estimated 8.9% reduction in energy costs.[1]

In closing, we appreciate your consideration of ASHRAE's input and look forward to continued engagement on this RFI and subsequent rulemaking. We welcome any follow-up questions about ASHRAE's standards development process, the IgCC, ASHRAE Standard 90.1, or other technical matters. If you would like any clarification on the submitted response or have any other questions, please contact GovAffairs@ashrae.org.

Thank you for your consideration.

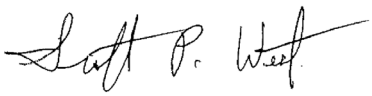
Sincerely,



Bill McQuade
ASHRAE Society President, 2025-2026

Whitney Lampe
Chapter President, ASHRAE Fort Worth Chapter

[1] Determination Regarding Energy Efficiency Improvements in ANSI/ASHRAE/IES Standard 90.1-2022, U.S. Department of Energy, February 2024: https://www.regulations.gov/document/EERE-2023-BT-DET-0017-0001



Scott West
Government Affairs Chair, ASHRAE Fort Worth Chapter

Nick Janssen
Chapter President, ASHRAE Houston Chapter

Tobi Showunmi
Government Affairs Chair, ASHRAE Houston Chapter

Tim Campbell
Chapter President, ASHRAE Dallas Chapter