

The Honorable Joe Manchin
Chairman Energy & Natural Resources
Committee
U.S. Senate
306 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Lisa Murkowski
U.S. Senate
522 Hart Senate Office Building
Washington, D.C. 20510

July 1, 2021

**Insulation Industry Supports the INSULATE Buildings Act
and Strong Policies for Energy Code Adoption**

Dear Senators Manchin and Murkowski:

In developing new policies that address building energy efficiency to support our Country's response to the growing challenges associated with climate change, the undersigned organizations encourage you to include strong incentives for states and territories to adopt modern building energy codes. We commend you for your leadership in introducing S. 2066, The Investing in New Strategies for Upgrading Lower Attaining Efficiency (INSULATE) Buildings Act. Our organizations support additional federal funding for building renovations that are intended to improve energy efficiency, as proposed under the INSULATE Buildings Act. Additionally, we are pleased to see the provisions included within Title V, Energy Efficiency and Building Infrastructure, of the energy infrastructure discussion draft. This discussion draft provides important recognition of the critical role buildings play in establishing a strong, sustainable and resilient infrastructure. However, the impact of the INSULATE Buildings Act could be increased significantly by leveraging this new funding to encourage states and territories to adopt the 2021 International Energy Conservation Code (IECC) for residential and commercial buildings.

Building energy codes are the most successful and cost-effective policy for addressing energy waste in a sector that is responsible for 39% of total energy consumption, 75% of electricity use (and an even greater share of peak power demand), and 36% of energy-related carbon dioxide emissions (source: <https://www.eia.gov/environment/emissions/carbon/>). The adoption of energy codes, like other building codes, is left to the discretion of states, territories and/or local governments. The Department of Energy has made significant progress to encourage these jurisdictions to adopt and enforce updated codes with technical assistance and other modes of support; however, progress to date has not been uniform and the jurisdictions that have fallen behind undermine our Nation's efforts to mitigate and respond to the impacts of climate change. In fact, today twelve states have a statewide energy code that is weaker than the version of the model code that was published more than a decade ago. Buildings constructed under these older, weaker codes use between 16% and 65% more energy compared to the 2018 IECC or ASHRAE Standard 90.1-2016 (source: U.S. Department of Energy's [State Adoption Tracking Analysis](#)).

Before providing states and territories with additional funding to retrofit existing buildings, these jurisdictions should be required to take the prudent action of adopting the 2021 IECC. For purposes of the INSULATE Buildings Act and the pending infrastructure package, we urge you to consider a requirement similar to the one that was included under section 401(2) of P.L. 111-5, The American Recovery and Reinvestment Act of 2009 (ARRA), which provided additional

funding for State Energy Program grants, but restricted the grants to states that took certain actions regarding adoption and compliance with the latest model energy code.

The undersigned organizations represent domestic manufacturers, distributors and installers of insulation products used to improve the long-term performance of residential and commercial buildings as well as industrial facilities. Our industry stands ready to support your continuing efforts to include strong building energy efficiency provisions in federal policy.

Sincerely,

American Chemistry Council
Cellulose Insulation Manufacturers Association
EPS Industry Alliance
High Performance Insulation Professionals
Insulation Contractors Association of America
National Insulation Association
North American Insulation Manufacturers Association
Polyisocyanurate Insulation Manufacturers Association
Spray Polyurethane Foam Alliance
Structural Insulated Panel Association