Public Citizen comments on Austin adoption of 2024 International Energy Conservation Code

7/8/24

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Commercial code:

Public Citizen strongly supports the City of Austin adopting the IECC 2024 Technical Code for commercial buildings, as proposed by staff. This code update is important for meeting the city's climate, energy and affordability goals. It will improve energy efficiency and the ability to participate in demand response programs for new buildings, while enabling easier and more affordable electrification of transportation and buildings. We support adopting the proposed base code and the proposed electric-ready, EV-ready, demand response and energy storage appendixes. These provisions will reduce greenhouse gas emissions, reduce other air pollution emissions and make buildings more resilient and flexible for future occupants.

The EV-ready requirement is important for enabling wider adoption of electric vehicles. Electric vehicles are more affordable than ICE vehicles over time, but access to charging is still a challenge. The cost of installing a charger is significantly less if it is included in the original design of the building. Likewise, planning for future installation of electric appliances is cost-effective. These are important provisions for enabling beneficial electrification and decarbonization, as called for in the Austin Climate Equity Plan.

Likewise, demand response and energy storage provisions align with the Austin Climate Equity Plan and the Austin Energy Resource, Generation and Climate Protection Plan.

Residential Code:

Public Citizen strongly supports the City of Austin adopting the IECC 2024 Technical Code for residential buildings, as proposed by staff, with one exception. This code update is important for meeting the city's climate, energy and affordability goals. It will improve energy efficiency and the ability to participate in demand response programs for new buildings while enabling easier and more affordable electrification of transportation and buildings. We support adopting the proposed based code and the proposed electric-ready, EV-ready, and demand response appendixes. These provisions will reduce greenhouse gas

emissions, reduce other air pollution emissions and make buildings more resilient and flexible for future occupants.

The EV-ready requirement is important for enabling wider adoption of electric vehicles. Electric vehicles are more affordable than ICE vehicles over time, but access to charging is still a challenge. The cost of installing a charger is significantly less if it is included in the original design of the building. Likewise, designing for future installation of electric appliances is cost-effective. These are important provisions for enabling beneficial electrification and decarbonization, as called for in the Austin Climate Equity Plan.

Likewise, the demand response provision aligns with the Austin Climate Equity Plan and the Austin Energy Resource, Generation and Climate Protection Plan.

The one change that we request is for the exemption is for exception number 2 to section "RK101.1 Electric readiness" to be removed. This exception to the requirement to provide space for a heat pump water heater contradicts the goal of electrifying and decarbonizing buildings. It would leave future homeowners without an easy option to switch to an efficient heat pump water heater without incurring the significant cost of creating a space for it in the home and hiring a plumber and an electrician to connect a heat pump where one was not designed for. Additionally, including this exception could encourage more builders to install tankless water heaters on the exterior of homes, leaving them vulnerable during freezing temperatures. Many water heaters on the exterior of homes were damaged and required replacing after Winter Storm Uri. Not only does this inconvenience residents, it is also a waste of resources. The City of Austin should be encouraging resilient design of homes. Including this exception could encourage more such poor design because a builder may want to avoid the water heater space requirement and the only way to do so would be to place the tankless water heater outside. We request a conversation with the appropriate staff to discuss removing this exception.