



June 27, 2016

The Department of Public Safety

Attn: Stephen Carley

RE: ACC Comments Supporting the Adoption of the 2015 IECC and ASHRAE Standard 90.1-2013 in Massachusetts

Dear Mr. Carley:

I am writing in support of the adoption of the 2015 International Energy Conservation Code (*IECC*) and ASHRAE Standard 90.1-2013 into the 9th Edition of the Massachusetts State Building Code, as proposed on the Board of Building Regulations and Standards (BBRS) website. **ACC supports the adoption of these model codes without any weakening amendments.** This will provide a variety of options for developers and design professionals – all of which will yield substantial energy and cost savings for many years.

The American Chemistry Council (ACC) is a national trade association representing chemicals and plastics manufacturers in the United States, including member companies in the Commonwealth of Massachusetts and providing over 17,000 direct jobs. Our members are committed to the safety of their products and to the protection of public health. Over 96% of all manufactured goods are directly touched by the business of chemistry, making this industry an essential part of every facet of our nation's economy. Chemistry provides significant economic benefits in every state including Massachusetts. Thanks to chemistry, our lives are healthier, safer more sustainable and productive than before.

Owners and operators of buildings constructed to the 2015 IECC in Massachusetts will save a substantial amount of energy and money. Like the 2012 IECC, the 2015 IECC will yield significant energy and cost savings for generations of Massachusetts residents. The consideration of the 2015 *IECC* will also help Massachusetts meet its obligations under federal law. The U.S. DOE has carefully reviewed the 2015 *IECC* as required by federal law and has determined that it represents an improvement in energy efficiency as compared to the 2012 IECC. Under that process, states have until June 12, 2017 to certify that they have reviewed and considered adopting this improved model code. The current process to consider the 2015 *IECC* will help Massachusetts satisfy this requirement.

The benefits of adopting the 2015 IECC include more comfortable and more efficient homes, a reduced need to build and site additional generation to meet growing electric demand, and the associated environmental impacts. These improvements will not only benefit the owners of these modern homes, but will also benefit Massachusetts citizens as a whole.

Massachusetts has businesses employing people in the development and sale of building products and systems used to increase the energy efficiency of buildings. In addition, manufacturers participate in the regular improvement model codes as a means of delivering the very performance we expect from our office buildings, schools and homes. Companies in the advanced manufacturing sector provide quality jobs for the people of Massachusetts.

The 2015 *IECC* is the most recent nationally-recognized model energy conservation code, and is the final product of a consensus-based, national model code development process that involves many of the nation's leading experts in energy efficiency, building design, and product performance.



Massachusetts has historically maintained pace with the improvements in the IECC for residential and commercial construction, and it has an opportunity to again be among the leaders in its region.

ACC strongly supports Massachusetts adoption and implementation of the 2015 IECC and we are happy to answer any questions that you have as you work to maximize building energy efficiency. Please contact me at [redacted] if we can be of any further assistance.

Regards,



Stephen Rosario
Senior Director, Northeast Region
American Chemistry Council