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**From:** Z.  
**Sent:** Tuesday, June 07, 2016 10:52 PM  
**To:**  
**Cc:**  
**Subject:** FW: comments on the 9th edition MA amendments  
**Attachments:** MA amendment 2015 IECC.pdf

Public comment on the Energy Code

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**Sent:** Friday, May 27, 2016 4:39 PM  
**Subject:** comments on the 9th edition MA amendments

Mr Zemel,

Please find attached NBI's comment on the need for an additional amendment to the 2015 IECC.

Thank you  
Jim edelson

## PROPOSED MASSACHUSETTS AMENDMENT TO 2015 IECC

**C503.1 General.** *Alterations* to any building or structure shall comply with the requirements of the code for new construction. *Alterations* shall be such that the existing building or structure is no less conforming to the provisions of this code than the existing building or structure was prior to the *alteration*. *Alterations* to an existing building, building system or portion thereof shall conform to the provisions of this code as those provisions relate to new construction without requiring the unaltered portions of the existing building or building system to comply with this code. *Alterations* shall not create an unsafe or hazardous condition or overload existing building systems.

*Alterations* complying with ANSI/ASHRAE/IESNA 90.1 need not comply with Sections C402, C403, C404 and C405.

**Exception:** The following *alterations* need not comply with the requirements for new construction, provided the energy use of the building is not increased:

1. Storm windows installed over existing *fenestration*.
2. Surface-applied window film installed on existing single-pane *fenestration* assemblies reducing solar heat gain, provided the code does not require the glazing or *fenestration* to be replaced.
3. Existing ceiling, wall or floor cavities exposed during construction, provided that these cavities are filled with insulation.
4. Construction where the existing roof, wall or floor cavity is not exposed.
5. *Roof recover*.
6. *Air barriers* shall not be required for *roof recover* and roof replacement where the *alterations* or renovations to the building do not include *alterations*, renovations or *repairs* to the remainder of the building envelope.
7. ~~*Alterations* that replace less than 50 percent of the luminaires in a space, that such *alterations* do not increase the installed interior lighting power.~~

REASON: New Buildings Institute was one of the primary contributors to GEW- 4 and GEW - 5, the two proposals to the 2015 IECC that taken together were the basis for the creation of the new Section C503. When the approved proposals were correlated with the existing language by ICC staff, ICC staff did not strike exception 7 as was intended by the authors - and as was made clear in testimony at the Final Action Hearings in Atlantic City, New Jersey. The exception 7 artifact now in the 2015 IECC clearly conflicts with the language in GEW-4 that is now found at C503.6 of the 2015 IECC. This proposed amendment will resolve that conflict.