



November 12, 2025

Greg Metz, Chairman
Minnesota Construction Codes Advisory Council
Department of Labor and Industry
443 Lafayette Road N.
St. Paul, MN 5515

WDMA Comments to the Proposed Minnesota Residential Energy Code

Dear Chairman Metz and Members of the Council,

The Window and Door Manufacturers Association (WDMA) appreciates the opportunity to provide comments on the proposed update to the Minnesota Residential Energy Code. WDMA is a national trade association representing the country's leading manufacturers of windows, doors, and skylights, many of whom are based in Minnesota. Our members serve a wide range of stakeholders, including distributors, dealers, builders, remodelers, homeowners, architects, and contractors in the residential and commercial construction sectors. WDMA actively participates in the development of consensus-based national model codes and standards and maintains representation on the residential committee responsible for the International Energy Conservation Code (IECC).

WDMA is committed to energy efficiency, sustainability, and responsible environmental stewardship—values that are central to our mission. We recognize that energy use in buildings places a financial burden on homeowners and renters throughout Minnesota. However, housing affordability is also a significant concern that must be balanced when updating building codes.

WDMA supports the adoption of the unamended 2024 IECC, and we are concerned that the recommended amendments under consideration will introduce unnecessary complexity, inconsistency, and cost burdens. The code change proposals (CCPs) recommended by the Residential Energy Code Technical Advisory Group (TAG) would, in our view, create several practical and regulatory problems, including:

- Inconsistencies with national model code language
- Internal conflicts within the energy code
- Updates to REScheck needed by PNNL for Minnesota use
- Customized training materials unique to Minnesota amendments
- Negative impacts on housing affordability and energy policy goals
- Reduced flexibility through the elimination of the performance path
- Increased compliance costs due to required RESNET raters for the ERI path

After careful review, we find no compelling reason to amend the 2024 IECC and respectfully recommend that the Council adopt the model residential energy code without modification. This approach will ensure Minnesota's energy code remains cost-effective, consistent with national standards, and aligned with broader energy efficiency goals.



The Pacific Northwest National Laboratory research sponsored by DOE indicates that moving from the 2012 IECC to the unamended 2024 IECC will yield significant energy cost savings:

- Approximately 12% in Climate Zone 6
- Approximately 20% in Climate Zone 7

These improvements represent meaningful, cost-effective gains in energy performance and can be achieved without the proposed amendments that could complicate compliance and enforcement.

We understand that the Council must consider long-term energy efficiency targets established by the Legislature—commonly referred to as the Mitchell Provision—while also upholding statutory directives under Minnesota Statutes, Section 326B.07, which call for reducing inconsistencies, streamlining construction procedures, and improving coordination among jurisdictions.

Unfortunately, several of the proposed CCPs introduce new and confusing language inconsistent with both the 2024 IECC and the legislative objectives of code clarity and uniformity. Specifically, we are concerned about the following proposals recommended by the TAG: RE-39, RE-40, RE-41.1, RE-43.3, RE-45, RE-50, and RE-52.

WDMA supports Minnesota's continued effort to adopt modern, energy-efficient building codes. However, to ensure consistency, enforceability, and cost-effectiveness, we urge the Council to:

- **Reject the above-listed amendments; and**
- **Adopt the unamended 2024 IECC as the Minnesota Residential Energy Code.**

This will deliver measurable energy savings, uphold housing affordability, and maintain alignment with the state's long-term sustainability objectives.

If you have any questions or concerns about WDMA's comments, please don't hesitate to contact me at **CDrumheller@wdma.com**.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Drumheller", written over a light blue horizontal line.

Craig Drumheller
WDMA Vice President of Technical Activities

CC:

Commissioner Nicole Blissenbach (dli.communications@state.mn.us)

Sen. Jen McEwen, Chair, Senate Labor Committee (sen.jennifer.mcewen@mnsenate.gov)

Sen. Gene Dornick, Ranking Member, Senate Labor Committee (sen.gene.dornink@mnsenate.gov)

Rep. Dave Baker, Co-Chair, House Workforce, Labor, and Economic Development Finance and Policy Committee (rep.dave.baker@house.mn.gov)

Rep. Dave Pinto, Co-Chair, House Workforce, Labor, and Economic Development Finance and Policy Committee (rep.dave.pinto@house.mn.gov)