

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

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RE 4

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Proposed Code Change - Language

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

Proposed Code Change – Need and Reason

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

Proposed Code Change – Cost/Benefit Analysis

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

The proposal is a clarification intended to specify the specific requirements for roof replacement projects. For some projects, the option of installing reduced levels of insulation will reduce project cost. For other projects, the cost balance between additional insulation cost with reduced labor and modification expense is likely to be neutral. In those projects where insulation levels might be greater, the energy benefits of the additional thermal resistance provides a reasonable payback in heating energy expense.

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule. (This proposal restores the base code language)

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.
No.

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No.

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.
No.

5. Who are the parties affected or segments of industry affected by this proposed code change?
Builders, architects and designers, product manufacturers and contractors.

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.
No.

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.
EPACT requires states to seek appropriate energy efficiency code provisions.

1. Modify the draft code language in Table R402.1.1 to change the R-21 cavity only option in climate zones 6-8 to R-18:

28 ~~21~~ or 20+5 or 13+10^b

(following text remains unchanged)

Reason Statement: The prescriptive envelope requirements for roof replacement in the base code provide equivalent options for a combination of cavity and continuous insulation. The proposed amendment in the DLI draft rule does not provide an equivalent option, and in fact the proposed performance value is close to the requirements for climate zone 3-5. This is a substantial weakening of the prescriptive requirements of the IECC adoption in Minnesota, and will result in about 18% greater energy loss through the opaque wall areas. This modification proposes an R-28 cavity-only option that provides equivalent energy performance to the combination assemblies included in the base code.