

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

Author/requestor: Bruce Nelson
Email address: bruce.nelson@state.mn.us
Telephone number: 651-297-2313
Firm/Association affiliation, if any: Minn. Dept. of Commerce

1323, CE-11c

Proposed Code Change - Language

IECC is amended by adding a new section to read:

C401.3 Additional requirements.

C401.3.1 Prohibition of Heated Commercial Parking Facilities.

An enclosed structure or portion of an enclosed structure used primarily as a parking garage or ramp for three or more motor vehicles shall not be heated.

Exceptions:

- (a) Parking facilities where a majority of parking spaces are within the same building structure as dwelling unit occupancies.
- (b) Parking facilities used exclusively to house vehicles for public emergency, ambulance, or public utility emergency response.
- (c) Parking facilities that are incidentally heated by building relief or environmental exhaust air, excluding exhaust air containing odors, noxious fumes, or high moisture levels. The use of relief or environmental exhaust air shall not create a safety hazard.

C401.3.2 System commissioning

Mechanical and electrical systems must comply with Section C408, System Commissioning.

Proposed Code Change – Need and Reason

Need and reason for **C401.3.1 Prohibition of Heated Commercial Parking Facilities:**

This proposal simply moves the requirement of current Minnesota Rule Part 1323.0646 verbatim. Furthermore:

Minn. Stat. 216C.20 Subd. 3. Provides:

***Parking ramp.** No enclosed structure or portion of an enclosed structure constructed after January 1, 1978, and used primarily as a commercial parking facility for three or more motor vehicles shall be heated. Incidental heating resulting from building exhaust air passing through a parking facility shall not be prohibited, provided that substantially all useful heat has previously been removed from the air.*

It would be irresponsible to not include this requirement in the Minnesota Building Code - either the clarified language of current Minnesota Rule Part 1323.0646, or at least a citation to 216C.20 Subd. 3. If such language would not be included in the building code neither permit applicants nor designers would not have the slightest idea that the provision exists in Minnesota law.

Furthermore building officials would have no authority to enforce a highly relevant state law if it did not exist in building code rule.

Need and reason for C401.3.2, Systems commissioning:

The proposal to include HVAC systems commissioning essentially moves with improvements a requirement of current Minnesota Rule Part 1323.0672, Subpart 3 for HVAC acceptance testing. The proposed improvements are needed because the IECC Section C408 is superior in several ways. First, the acceptance testing and documentation specified in the currently referenced ASHRAE Guideline 0-2005 is much more clearly stated in Section C408. Second, the exceptions in current Minnesota Rule are not appropriate because (a) the HVAC systems of semiconditioned buildings can waste energy if they are not commissioned, and (b) the referenced standard is no longer in print or even available on the Web.

The HVAC systems commissioning proposal is reasonable because the proposed requirement is basically the same as the requirement in current Minnesota Rule. The proposed requirement does not change the scope of applicability: both current and proposed apply only to HVAC systems. Section C408.2.3.2 contains a sentence that is practically identical to a sentence in the current Minnesota Rule.

The proposal adds a new requirement for functional testing of lighting system controls (section C408.3). The proposal is needed and reasonable to ensure that sophisticated controls installed to comply with the code actually do work so the owner can derive the energy savings benefits.

Proposed Code Change – Cost/Benefit Analysis

The proposal for HVAC commissioning will retain existing rule, therefore there will be no increase/decrease to costs or benefits. The proposal for commissioning lighting system controls does no more than require the system work as it should, therefore would not increase costs beyond what a standard installation should cost.

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).
Adding to IECC a new sections C401.3.1 and C403.3.2.

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
Proposed C401.2.1 is moved verbatim from Minnesota Rule Part 1323.0646.
Proposed C401.2.2 is essentially moved with improvements from Minnesota Rule Part 1323.0672, Subpart 3.

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.

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.

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.
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?
Electrical contractors heretofore doing inferior lighting controls installations will be affected.
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.
7. No.
8. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.
No.