

REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, All Provisions

DEADLINE FOR RECEIPT: TBD

PLEASE NOTE: This request may extend to several pages. Please be sure you have reached the end of the document.

The Rules Review Commission staff has completed its review of this Rule prior to the Commission's next meeting. The Commission has not yet reviewed this Rule and therefore there has not been a determination as to whether the Rule will be approved. You may email the reviewing attorney to inquire concerning the staff recommendation.

In reviewing this Rule, the staff recommends the following changes be made:

In their comment in opposition to the NC Energy Conservation Code, the NC Homebuilders Association encloses an email exchange between their director of Codes and Construction, Cliff Isaac, and staff at the Building Code Council regarding the Council's failure to incorporate a statutory exemption into the NC Energy Conservation Code.

In the final email of the exchange, Building Code Council member Kim Wooten states:

[t]here are many examples of building codes and state statutes not in agreement. The NCBCC adopts codes for the general welfare of the public per statute. The General Assembly may make laws that contradict codes and may affect the general welfare of NC citizens, but that effort is independent of the NCBCC (emphasis added).

In light of this statement, please disclose any and all provisions of the 2024 NC Energy Conservation Code that the Council is aware are "not in agreement" with the laws of the State of North Carolina.

Can you respond to the Homebuilder's Association's assertion that the fiscal note prepared by the BCC is inaccurate? Specifically, the Homebuilders assert that the incremental costs of implementation are based on an analysis of the differences between the 2018 International Energy Conservation Code and the 2021 International Energy Code, rather than the differences between the 2024 NC code and the 2018 NC code. Please respond.

Second, the Homebuilders allege that the cost increase for single family construction (if applied voluntarily) would be \$20,400 per dwelling, rather than the maximum of \$6,487 per dwelling indicated of Table 8 of the BCC's cost benefit analysis, and that

Brian Liebman
Commission Counsel

Date submitted to agency: April 10, 2024

much of that cost is due to items not taken into account by the BCC (see p.6 of the Homebuilders' comment).

In responding, please specifically answer whether the baseline conditions were incorrectly assessed, whether the note failed to "estimate any additional costs that would be created by implementation", or whether the note did not correctly describe "the types of expenditures that persons affected by the proposed rule change would have to make to comply". See G.S. 150B-21.4(b1) and (b2).

Please retype the rule accordingly and resubmit it to our office at 1711 New Hope Church Road, Raleigh, North Carolina 27609.

Brian Liebman
Commission Counsel
Date submitted to agency: April 10, 2024

REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Ch. 1

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In reviewing this Rule, the staff recommends the following changes be made:

In C101.2, how does this provision comply with G.S. 143-138(b15) which provides that the alteration of commercial buildings that received a certificate of occupancy prior to January 1, 2012 may be subject to the Energy Conservation Code in effect on December 31, 2011 as long as the addition does not increase the building area by more than 150%? See also Chapter 5, for which I have a similar question.

In C101.4.1, what is the "IECC"? Spell out the first instance of the abbreviation.

In C101.5, the Code says that residential buildings shall comply with IECC-Residential Provisions. However, in the definition of "residential building" in C202, the term includes "one- and two-family dwellings and townhouses." SL 2023-108 explicitly bars the Council from adopting new energy conservation rules for buildings covered by the Residential Code. Thus, to the extent you are regulating one- and two-family dwellings and townhouses, I believe the Council lacks statutory authority.

*In C102.1, the code official shall find that the work is "satisfactory" **and** "complies with the intent of the provisions of this code..." In that context, what does "satisfactory" mean?*

In C102.1.1, the second sentence is unclear. The term "approved" means "acceptable to the code official", yet this sentence says the building would be approved in writing by "an energy efficiency program". How does a program approve a building?

In C103.1, what is a "special condition"?

In C103.2, what is "suitable material"?

In the list under C103.2, number 1, what is an "energy compliance path"?

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In 103.6.2, what other “energy code editions” would be applicable? Doesn’t the 2024 code supersede any other code?

In C103.6.3, who are you requiring to provide the training? Consider revising in the active tense.

In C104.1, is there statutory authority to allow the code official to delegate the inspection duties to “a designated agent” or an “approved agency”? Same question for C104.4.

What do the following sentences in C104.1 mean? It sounds like you’re saying the owner cannot rely on approval by the code official.

Approval as a result of an inspection shall not be construed to be an approval of a violation of the provisions of this code or of other ordinances of the jurisdiction. Inspections presuming to give authority to violate or cancel the provisions of this code or of other ordinances of the jurisdiction shall not be valid.

In C108.3, what constitutes an “emergency”?

In C109.1, what is the “governing body”?

In C109.1, where is the statutory authority to allow the code official to be a member of the board of appeals hearing the appeal of his decision?

In C109.1, where is your statutory authority to delegate rulemaking authority to the board of appeals?

In C109.2, what “rules legally adopted” under this Code are you referring to?

In C109.3, experience and training in what discipline?

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Ch. 2

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In reviewing this Rule, the staff recommends the following changes be made:

In C202, the definition of "Approved Agency", please define "established". Also, "recognized" by whom?

In C202, the definition of "Captive Key Override", can you explain what this means?

In C202, the definition of "Group R", is there a reason that R-3 is omitted?

In C202, the definition of "residential building", the definition includes "detached one- and two- family dwellings" and "townhouses". SL 2023-108 explicitly bars the Council from adopting new energy conservation rules for buildings covered by the Residential Code. Thus, to the extent you're regulating "buildings, dwelling, and structures to which the North Carolina State Residential Code applies" the Council lacks statutory authority.

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Ch. 3

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In reviewing this Rule, the staff recommends the following changes be made:

Independent of any other change to the Code, what is the effect of changing the climate zones for most of North Carolina?

Please retype the rule accordingly and resubmit it to our office at 1711 New Hope Church Road, Raleigh, North Carolina 27609.

REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Ch. 4

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In reviewing this Rule, the staff recommends the following changes be made:

In C401.2.2, what version of ANSI/ASHRAE/IESNA 90.1 are you requiring compliance with? The 2022 version available online is over 450 pages long. Are the requirements there mirrored here?

In C402.1.1.1, are not greenhouses exempt from the Building Code by G.S. 143-138(b4), which states: "Building rules do not apply to . . . (ii) farm buildings that are located inside the building rules jurisdiction of any municipality if the farm buildings are greenhouses...."? [Note, this is potentially satisfied by the addition of the exception to C101.2, however, see below.]

Even with the addition of an exemption for "Farm structures exempt by N.C.G.S. 143-138(b4) to the scope provision in C101.2, I think there remains ambiguity, as at least to me, it isn't clear that all the structures exempt by the statute are not also exempted from the specific provisions in C402. For instance, the statute explicitly exempts greenhouses, but they are specifically regulated in C402.1.1.1. Another example (and I note that these two examples I am providing are not exclusive) would be equipment buildings regulated by C402.1.1.2. Moreover, in their response to the Council's latest proposed change to C101.2, the Homebuilders Association specifically references C401.2.2, which it seems to me may cover the exempted structures to the extent they're included in ANSI/ASHRAE/IESNA 90.1.

Please respond to the assertion made in the Homebuilders' Association's April 1, 2024 response to the changes made to the two scope provisions that modifying the scope provisions without making changes to C402 creates a conflict, and thus ambiguity between C101 and C402.

In C402.1.5, what is IECC-2021 COMcheck?

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In C402.5.2.3.1, items 3, 4, and 7, should that say ½ inch or 1 and ½ inch?

In the exception to C403.7., you accidentally deleted “be”. It should read “...shall be an alternative...”

In C403.12.3.1, “Adhesive tape shall not be permitted” for what use? As insulation? Or as the protection for the insulation? Attaching the insulation?

In C405.3.2, and in C405.5.2 can you explain the “total interior lighting power allowance” and “exterior lighting power allowance”, respectively? Do you have statutory authority to say how much power an entity will use?

Moreover, G.S. 143-138(b16) states that “no permit shall be required under the Code or any local variant . . . for the repair or replacement of . . . lighting fixtures in residential or commercial structures, provided that” the repair doesn’t require addition or relocation of wiring, the work is performed by a licensed electrician, and the repair is performed in accordance with the current edition of the Building Code (which I believe refers to the Commercial Code, rather than the entire compendium of the different codes). If a permit is not required for replacement of a light fixture, certainly a permit cannot be required for replacement of a light bulb. Under that logic, how can the Council regulate under C405.3.2 and 405.4.2? Can you restrict a building owner from installing a brighter bulb in a particular fixture?

In C405.12, buildings shall be equipped to report energy consumption to whom?

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Ch. 5

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In reviewing this Rule, the staff recommends the following changes be made:

In C501 generally, how do these provisions comply with the requirements of G.S. 143-138(b15) that existing commercial buildings granted a certificate of occupancy prior to January 1, 2012 be subject to the Energy Conservation Code in effect on December 31, 2011?

Specifically, G.S. 143-138(b15) states that the addition of such buildings are subject to the 2011 code "so long as the addition does not increase the building areas of the existing commercial building or structure to more than one hundred and fifty percent (150%) of the building area of the commercial building or structure as it was in existence on December 21, 2011. Nevertheless, C501.2 states that all additions, alterations, repairs, and changes of occupancy to, or relocation of, existing buildings and structures shall comply with Sections C502, C502, C504, and C505 of the 2024 Code. None of these provisions explicitly reference the 2011 Code, nor do any of these provisions reference the 150% requirement in the statute.

In C502.2, what is a "UA"?

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Appendix CB

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In reviewing this Rule, the staff recommends the following changes be made:

In CB101.1, where are solar ready provisions required? Required by whom?

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Commercial Provisions, Appendix CC

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In reviewing this Rule, the staff recommends the following changes be made:

Please refile this with corrected formatting. Some of the type is too small to read, and the formatting is generally out of standard, as the tabs, font, and other aspects are inconsistent.

*The title says that these provisions are not mandatory, but CC101.1 says that the purpose is to “**require** renewable energy systems of adequate capacity to achieve net zero carbon.” This is inconsistent. Also, do you mean “net zero carbon emissions”?*

Please retype the rule accordingly and resubmit it to our office at 1711 New Hope Church Road, Raleigh, North Carolina 27609.

REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Residential Provisions, Ch.1

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In reviewing this Rule, the staff recommends the following changes be made:

In R101.2, the scope of these provisions includes “residential buildings.” However, in the definition of “residential building” in both C202 and R202, the term includes “one- and two-family dwellings” and “townhouses.” SL 2023-108 explicitly bars the Council from adopting new energy conservation rules for buildings covered by the Residential Code. Thus, to the extent you’re regulating “buildings, dwelling, and structures to which the North Carolina State Residential Code applies” the Council lacks statutory authority.

This may also be a problem for your fiscal note, to the extent that the fiscal note refers to R101.2 and R202 for the proposition that the Energy Conservation Code applies only to R-2 and R-4 buildings. If this language remains, and requires structures covered by the Residential Code to comply with the Energy Conservation Code, that would call into question the calculations upon which the fiscal note was based.

Also the definition of “residential building” in R202 referenced in R101.2 explicitly includes R-3 buildings. However, in your fiscal note, you repeatedly say that the residential provisions of the Energy Conservation Code apply only to R-2 and R-4 buildings and are otherwise voluntary. Again, I think that would call your cost calculations into question.

Also, while I usually do not comment on deletions, I am not sure why the exception to R101.2 was deleted. G.S. 143-138(b19) remains good law and continues to exempt residential garages from energy conservation provisions. [Note, this request would be satisfied by the changes submitted in your most recent amendment to R101.2]

In R102.1, the code official shall find that the work is “satisfactory” and “complies with the intent of the provisions of this code...” In that context, what does “satisfactory” mean?

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In R102.1.1, the second sentence is unclear. The term “approved” means “acceptable to the code official”, yet this sentence says the building would be approved in writing by “an energy efficiency program”. How does a program approve a building?

In R103.1, what is a “special condition”?

In R103.2, what is “suitable material”?

In the list under R103.2, number 1, what is an “energy compliance path”?

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Residential Provisions, Ch.2

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In reviewing this Rule, the staff recommends the following changes be made:

In general, why are there many definitions not reproduced from the commercial provisions here? For instance, in C202, there's a definition of "Group R" which seems like it would be applicable here, but is not included.

In R202, the definition of "Approved Agency", please define "established". Also, "recognized" by whom?

In R202, the definition of "Renewable Energy Certificate (REC)", I do not understand the definition. How can an instrument represent environmental attributes? What is an instrument in this context? What are the environmental attributes of one megawatt hour of renewable energy?

In R202, the definition of "residential building", the definition includes "detached one- and two- family dwellings" and "townhouses". SL 2023-108 explicitly bars the Council from adopting new energy conservation rules for buildings covered by the Residential Code. Thus, to the extent you're regulating "buildings, dwelling, and structures to which the North Carolina State Residential Code applies" the Council lacks statutory authority.

In R202, the definition of "ventilation air", what is "supply air"?

Please retype the rule accordingly and resubmit it to our office at 1711 New Hope Church Road, Raleigh, North Carolina 27609.

Brian Liebman
Commission Counsel

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Residential Provisions, Ch. 3

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In reviewing this Rule, the staff recommends the following changes be made:

Independent of any other change to the Code, what is the effect of changing the climate zones for most of North Carolina?

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AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Residential Provisions, Ch.4

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In reviewing this Rule, the staff recommends the following changes be made:

I do not see where R402 complies with Section 6.(b) of SL2023-108, which requires the Council to amend R402 to allow a specific amendment regarding ceiling insulation minimums. See also Appendix R1.2.1.

Even in the wake of the change to R101.2 to exempt garages pursuant to G.S. 143-138(b19), do the provisions in R402 applicable to garages (R402.2.12, R402.3.5, R402.4.1.2) remain effective? If so, under what authority? If not, how do these provisions not create ambiguity?

In R402.1.4, is the "(ci)" following "Continuous insulation" necessary? I don't see the term abbreviated anywhere else.

In R402.1.5, what is "REScheck"?

Please retype the rule accordingly and resubmit it to our office at 1711 New Hope Church Road, Raleigh, North Carolina 27609.

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Commission Counsel

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Residential Provisions, Ch.5

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In reviewing this Rule, the staff recommends the following changes be made:

In R504.2, are these three items the only activities that would be considered “repairs”? What about G.S. 143-138(b16), which exempts repair or replacement of “dishwashers, disposals, water heaters, electrical devices, or lighting fixtures in residential . . . structures”?

Also, in item 3 under R504.2, the language suggests that where the bulb or ballast in an existing luminaire is replaced and increases interior lighting power, this would not be a repair, and thus would be subject to other aspects of the Code, and therefore would require a permit. However, G.S. 143-138(b16) states that “no permit shall be required under the Code or any local variant . . . for the repair or replacement of . . . lighting fixtures in residential or commercial structures, provided that” the repair doesn’t require addition or relocation of wiring, the work is performed by a licensed electrician, and the repair is performed in accordance with the current edition of the Building Code (which I believe refers to the Commercial Code, rather than the entire compendium of the different codes). If a permit is not required for repair of a lighting fixture, then one certainly cannot be required for a mere lightbulb.

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REQUEST FOR CHANGES PURSUANT TO G.S. 150B-21.10

AGENCY: N.C. Building Code Council

RULE CITATION: 2024 North Carolina Energy Conservation Code, Residential Provisions, Appendices

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In reviewing this Rule, the staff recommends the following changes be made:

When do Appendix R3B, R3B1, and R3C apply? They aren't referenced in the Code itself.

Is Appendix R4D struck? It's not entirely clear from the text.

It appears that Appendix RB, which explicitly applies to "detached one- and two-family dwellings and townhouses, is in violation of SL 2023-108, s.8.(b), which prohibits the Council from "prepar[ing] and adopt[ing] a new code provision, or any part of the Code, that relates to energy conservation or efficiency of buildings, dwellings, and structures to which the North Carolina State Residential Code applies."

Please retype the rule accordingly and resubmit it to our office at 1711 New Hope Church Road, Raleigh, North Carolina 27609.