

August 3, 2016

Energy Rating Index Work Group

C/O Jeff Blair, Facilitator

Subject: On-site Renewable Power Generation Credited for Compliance

These comments are submitted on the behalf of the Florida Home Builders Association (FHBA).

- The FHBA recommends giving full credit for on-site renewable power generation where on-site renewable energy is used under the Energy Rating Index (ERI) Compliance Alternative.
- FHBA recommends the adoption of the IECC 2015 mandatory provisions as the backstop for the ERI Compliance Alternative when utilizing on-site renewable energy sources for compliance under the ERI Compliance Alternative. FHBA recognizes the IECC 2015 permits the use of the IECC 2009 mandatory provisions for use with the ERI Compliance Alternative; however, when relying on on-site renewable energy production for compliance, FHBA recommends the use the more stringent mandatory provisions of the IECC 2015. The greater stringency would better serve the builder and consumer and while satisfying the intent of the law. The provisions of the IECC 2015 will provide continuing energy efficiency in a home in the event on-site renewable energy source is removed or becomes ineffective at a future date.
- When complying with the ERI Compliance Alternative and not employing on-site renewable energy sources for compliance, the thermal envelope provisions of the IECC 2009 as stated at IECC 2015 Section R406.2 would apply.
- The FHBA recommends there be no time limit placed on the use of on-site renewable energy sources and that the Florida Building Commission request changes to the legislation removing language resulting in the perception of such time limits.
- The FHBA recommends the ERI Work Group express the intent that renewable energy refers to energy produced from natural resources such as solar energy, wind, water, and geothermal sources and not energy generated by the burning of fuels or other materials.