

161-2018 Proponent Revision 08/09/18

STATE OF WASHINGTON

STATE BUILDING CODE COUNCIL

Washington State Energy Code Development Standard Energy Code Proposal Form

Code being amended:

Commercial Provisions

Residential Provisions

Code Section # New C501.4.1, C502.2.1, C502.2.2, C503.2, C503.3.2, C503.3.3, C505.1

Brief Description: Existing buildings are a large percentage of the building stock and thus represent a significant opportunity for energy savings. However, it can be difficult to bring an existing building up to the current Code due to inherent limitations.

The purpose of this proposal is to identify more clearly the compliance options currently available in the Code for existing building retrofits, and expand these compliance options so they are available for most retrofit project types.

This proposal also addresses the common challenge of locating accurate existing building information for Code compliance documentation.

Proposed code change text: (Copy the existing text from the Integrated Draft, linked above, and then use <u>underline</u> for new text and strikeout for text to be deleted.)

RETROFIT, BUILDING ENVELOPE. Includes building envelope alterations and building envelope upgrades required for an area undergoing a change in space conditioning or change in occupancy.

C501.4 Compliance. Alterations, repairs, additions and changes of occupancy to, or relocation of, existing buildings and structures shall comply with the provisions for alterations, repairs, additions and changes of occupancy or relocation, respectively, in this code and in the International Building Code, International Existing Building Code, International Fire Code, International Fuel Gas Code, International Mechanical Code, Uniform Plumbing Code, and NFPA 70.

C501.4.1 U-factor requirements for retrofits. For existing building projects where an *addition* or *building envelope retrofit* area is combined with existing-to-remain building areas to demonstrate compliance with this Code as a whole building, the U-factors applied to existing-to-remain envelope assemblies shall be per as-built record documents.

Exceptions:

- 1. If accurate as-built record documents are not available, U-factors for the existing envelope assemblies may be per the edition of the Washington State Energy Code that was in effect at the time the building was permitted.
- 2. <u>U-factors for the existing envelope assemblies as approved by the code official.</u>

C502.2.1 Vertical fenestration. Additions with *vertical fenestration* that results in a total building vertical fenestration area less than or equal to that specified in Section C402.4.1 shall comply with Section C402.4. Additions with vertical fenestration that results in a total building vertical fenestration area greater than that specified in Section C402.4.1 shall comply with one of the following:

- 1. Vertical fenestration alternate per Section C402.4.1.1 or C402.4.1.3 for the addition <u>area of the building</u> only.
- 2. Component performance option <u>alternative</u> with target area adjustment per Section C402.1.5 <u>for the addition</u> <u>area of the building only</u>.
- 3. Existing building and addition area are combined to demonstrate compliance with the component performance alternative for the whole building.
- 4. or the <u>T</u>otal building performance option in per Section C407 for the addition area of the building only.
- 5. <u>Total building performance</u> for the whole building.

C502.2.2 Skylight area. *Additions* with *skylights* that result in a total building skylight area less than or equal to that specified in Section C402.4.1 shall comply with Section C402.4. Additions with skylights that result in a total building skylight area greater than that specified in Section C402.4.1 shall comply with one of the following: August 9, 2018

- 1. Component performance option <u>alternative</u> with target area adjustment per Section C402.1.5 <u>for the addition area</u> <u>of the building only</u>.
- 2. Existing building and addition area are combined to demonstrate compliance with the component performance alternative for the whole building.
- 3. or the <u>T</u>otal building performance option in per Section C407 for the addition area of the building only.
- 4. <u>Total building performance</u> for the whole building.

C503.2 Change in space conditioning. Any nonconditioned space low energy space per Section C402.1.1.1 that is altered to become *conditioned space* or *semi-heated* space shall be required to be brought into full compliance with this code. Any <u>semi-heated</u> space per Section C402.1.1.2 that is altered to become <u>conditioned space</u> shall be required to be brought into full compliance with this code.

Commentary – This paragraph is TAG approved language per ENV-037. For buildings with more than one space conditioning category, the interior partition walls, ceilings, floors and fenestration that separate space conditioning areas shall comply with the thermal envelope requirements per the area with the highest level of space conditioning.

A change in space conditioning project shall be deemed to comply with this code if the project area alone complies or if the existing building and the project area combined comply with this code as a whole building.

Exceptions:

- Where the component performance building envelope option in <u>alternative per</u> Section C402.1.5 is used to comply <u>demonstrate compliance</u> with this Section, the Proposed <u>Total</u> Envelope UA is allowed to be up to 110 percent of the <u>Target</u> <u>Allowed Total Envelope</u> UA. <u>This exception may be applied to the project area alone, or to</u> <u>the existing building and project area combined as a whole building.</u>
- 2. Where the total building performance option in per Section C407 is used to comply with this section, the annual energy consumption of the proposed design is allowed to be 110 percent of the annual energy consumption otherwise allowed by per Section C407.3. This exception may be applied to the project area alone, or to the existing building and project area combined as a whole building.

C503.3.2 Vertical fenestration. The addition of *vertical fenestration* that results in a total building vertical fenestration area less than or equal to that specified in Section C402.4.1 shall comply with Section C402.4.3 or C407.

<u>The addition of *vertical fenestration*</u> Alterations that results in a total building vertical fenestration area greater than specified in Section C402.4.1 shall comply with one of the following:

- 1. Vertical fenestration alternate per Section C402.4.1.3 for the new vertical fenestration added.
- 2. Vertical fenestration alternate per Section C402.4.1.1 for the area adjacent to the new vertical fenestration added.
- 3. <u>Existing building and alteration area are combined to demonstrate compliance with the</u> component performance option <u>alternative</u> per Section C402.1.5 <u>for the whole building.</u>
- 4. or the <u>T</u>otal building performance option in <u>per</u> Section C407 for the whole building.

Exceptions:

- 1. <u>Additional envelope upgrades are included in the project so the addition of vertical fenestration does not cause</u> <u>a reduction in overall building energy efficiency</u>, as approved by the *code official*.
- 2. Where the component performance alternative for the whole building is used to comply with this Section, the Proposed Total Envelope UA is allowed to be up to 110 percent of the Allowed Total Envelope UA.
- 3. Where total building performance for the whole building is used to comply with this Section, the annual energy consumption of the proposed design is allowed to be 110 percent of the annual energy consumption allowed per Section C407.3.

C503.3.3 Skylight area. The addition of *skylights* that results in a total building skylight area less than or equal to that specified in Section C402.4.1 shall comply with Section C402.4.

<u>The addition of *skylights* Alterations</u> that results in a total building skylight area greater than that specified in Section C402.4.1 shall comply with <u>one of the following:</u>

- 1. <u>Existing building and alteration area are combined to demonstrate compliance with</u> the component performance option <u>alternative</u> per Section C402.1.5 <u>for the whole building.</u>
- 2. or the <u>T</u>otal building performance option in per Section C407 for the whole building.

Exceptions:

- 1. Additional envelope upgrades are included in the project so the addition of skylights does not cause a reduction in overall building energy efficiency, as approved by the *code official*.
- 2. Where the component performance alternative for the whole building is used to comply with this Section, the Proposed Total Envelope UA is allowed to be up to 110 percent of the Allowed Total Envelope UA.
- 3. Where total building performance for the whole building is used to comply with this Section, the annual energy consumption of the proposed design is allowed to be 110 percent of the annual energy consumption allowed per Section C407.3.

C505.1 General. Spaces undergoing a change in occupancy shall be brought up to full compliance with this code in the following cases:

- 1. Any space that is converted from an F, S or U occupancy to an occupancy other than F, S or U.
- 2. Any space that is converted to a Group R dwelling unit or portion thereof, from another use or occupancy.
- 3. Any Group R dwelling unit or portion thereof permitted prior to July 1, 2002, that is converted to a commercial use or occupancy.

Where the use in a space changes from one use in Table C405.4.2 (1) or (2) to another use in Table C405.4.2 (1) or (2), the installed lighting wattage shall comply with Section C405.4.

A change in occupancy project shall be deemed to comply with this code if the project area alone complies or if the existing building and the project area combined comply with this code as a whole building.

Exceptions:

- Where the component performance building envelope option in <u>alternative per</u> Section C402.1.5 is used to comply <u>demonstrate compliance</u> with this Section, the Proposed <u>Total</u> Envelope UA is allowed to be up to 110 percent of the <u>Target Allowed Total Envelope</u> UA. <u>This exception may be applied to the project area alone, or to</u> <u>the existing building and project area combined as a whole building.</u>
- 2. Where the total building performance option in Section C407 for the whole building is used to comply with this section, the annual energy consumption of the proposed design is allowed to be 110 percent of the annual energy consumption otherwise allowed by per Section C407.3. This exception may be applied to the project area alone, or to the existing building and project area combined as a whole building.

Where the use in a space changes from one use in Table C405.4.2 (1) or (2) to another use in Table C405.4.2 (1) or (2), the installed lighting wattage shall comply with Section C405.4.

Purpose of code change:

Existing buildings are a significant portion of the building stock. It is already recognized in the Code that there are many variables within an existing building that can make it difficult to bring the building up to the current code.

This proposal presents more clearly the current compliance allowances available in the Code for existing buildings and applies these allowances to more retrofit project types as follows:

- 1. Additions Per Section C502.1, "An addition shall be deemed to comply with this code if the addition alone complies or if the existing building and addition comply with this code as a single building." For additions that include vertical fenestration or skylights that cause the total building window-to-wall ratio (WWR) or skylight-to-roof ratio (SRR) to exceed the prescriptive allowances, this proposal clarifies that the component performance alterative or total building performance option may be applied to either the addition area only or the existing building and addition combined as a whole building.
- 2. **Envelope Alterations** For an envelope alteration that adds new vertical fenestration or skylights that causes the total building WWR or SRR to exceed the prescriptive allowances, Code language has been interpreted to state that "Component performance option with target area adjustment per Section C402.1.5 or the total building performance option in Section C407 for the whole building." This makes sense because it would be difficult to enforce this approach at the retrofit level. However, this limits the options for demonstrating compliance in this case. This proposal recommends allowing an "additional efficiency measure" approach to offset the excess fenestration, as well as allowing this type of project to utilize the 110% above Code allowance currently available for change in occupancy and change in space conditioning projects.
- 3. Change is space conditioning (CSC) or occupancy (CO) Often a CSC or CO project only includes a portion of a building, similar to an addition project. This proposal clarifies that the component performance alterative or total

building performance option may be applied to either the CSC or CO project area only, or the existing building and project area combined as a whole building, in the same manner as additions.

Since this proposal aims to clarify current compliance allowances already in the Code and add new allowances to retrofit projects that already have defined (although often difficult to comply with) allowances, this proposal does not introduce additional cost.

Your amendment must meet one of the following criteria. Select at least one:

Addresses a critical life/safety need.			Consistency with state or federal regulations.	
 The amendment clarifies the intent or application of the code. Addresses a specific state policy or statute. (Note that energy conservation is a state policy) 			 Addresses a unique character of the state. Corrects errors and omission 	
Check the building types that would be impacted by your code change:				
Single family/duplex/townhome		Multi-family 4 + stories		Institutional
Multi-family 1 – 3 stories		🔀 Commercial / Retail		🛛 Industrial
Your name	Lisa Rosenow		Email address	lisa.rosenow@neec.net
Your organization	NW Energy Efficiency Council		Phone number	206-624-0283
Other contact name Click here to enter text.				

Instructions: Send this form as an email attachment, along with any other documentation available, to: <u>sbcc@des.wa.gov</u>. For further information, call the State Building Code Council at 360-407-9278.

Economic Impact Data Sheet

Briefly summarize your proposal's primary economic impacts and benefits to building owners, tenants and businesses.

For building owners who wish to upgrade their existing buildings, it can be difficult and cost prohibitive to meet the current code prescriptively. This proposal provides flexibility to building owners to demonstrate compliance with the current Code for their retrofit projects, so that it is more cost effective to improve the energy performance of their existing buildings.

Provide your best estimate of the construction cost (or cost savings) of your code change proposal? (See OFM Life Cycle Cost <u>Analysis tool</u> and <u>Instructions</u>; use these <u>Inputs</u>. Webinars on the tool can be found <u>Here</u> and <u>Here</u>)

Indeterminate (For residential projects, also provide \$Click here to enter text./ dwelling unit)

Show calculations here, and list sources for costs/savings, or attach backup data pages

WSEC Envelope U-Factor History table, attached.

Provide your best estimate of the annual energy savings (or additional energy use) for your code change proposal? NA

Click here to enter text.KWH/ square foot (or) KBTU/ square foot

(For residential projects, also provide Click here to enter text.KWH/KBTU / dwelling unit)

Show calculations here, and list sources for energy savings estimates, or attach backup data pages

NA

List any code enforcement time for additional plan review or inspections that your proposal will require, in hours per permit application:

This proposal potentially reduces the amount of time required by jurisdictions to determine whether a retrofit project meets the intent of the Code by providing them with better project information with which to base their permitting decisions for retrofits.