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February 22, 2021

Minnesota House of Representatives  
Labor, Industry, Veterans and Military Affairs Finance and Policy Committee  
c/o Travis Reese, Committee Administrator  
75 Rev. Dr. Martin Luther King JR Boulevard  
Capitol 120  
St. Paul, MN 55155

Re: MEEA comments on advancing the commercial energy code adoption process

Dear Members of the House Labor, Industry, Veterans and Military Affairs Finance and Policy Committee,

Thank you for the opportunity to comment on advancing the commercial energy code adoption process in Minnesota. The Midwest Energy Efficiency Alliance (MEEA) is a member-based non-profit organization that promotes cost-effective energy efficiency policies in the Midwest. We have worked in Minnesota and other states in the region to provide technical assistance and education on energy efficient building policies since 2009.

MEEA supports the advancement of the commercial energy code adoption process in Minnesota by shortening the review cycle to a maximum of every 3 years following the national code development cycle. Adoption of new energy codes is a vital step to ensure commercial buildings are constructed with the most up-to-date building methods and technologies which lock in long-term improvements to building efficiency, comfort, air quality, and resilience. While Minnesota currently has established a 6-year code cycle which provides the state with an opportunity to regularly update the statewide energy code, this timeline results in missed opportunities to ensure inclusion of new technologies and cost-effective best practices in the code. Instituting a 3-year code adoption timeline for commercial buildings in the state will make it easier for builders to stay current with construction best practices, consistently improve upon the energy efficiency standards that commercial buildings are constructed to and guarantees commercial building owners and occupants the benefits of rapidly advancing technologies.

Buildings make up nearly 40% of the Minnesota's statewide energy use. Increasing the efficiency and reducing the energy consumption of this sector is essential to meeting the climate and energy goals put forth by the state. Energy efficiency was identified as



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a key step in meeting the energy goals that move Minnesota to 100% clean energy by 2050. A 3-year adoption cycle for Minnesota commercial energy codes will allow for more gradual and more easily implemented efficiency improvements. By establishing goals for advancing building energy efficiency and establishing a timeline that would move the construction industry towards net-zero construction, Minnesota can ensure that it is on track towards meeting these aggressive but achievable goals.

The adoption of new energy codes will result in more comfortable and more resilient buildings that require reduced costs to operate and maintain. Energy efficiency is especially important for occupants during extreme weather like the severe cold we are currently experiencing across the country. Commercial buildings built to newer energy codes increase grid reliability by reducing load demand and ensuring occupants have power when they need it most. By updating the commercial energy code every 3 years, the state can ensure commercial buildings are constructed with the most up-to-date building methods and increase the resiliency of the building stock in Minnesota.

Modifying the commercial energy code adoption process in Minnesota provides an important opportunity for the state to incorporate industry trends in building performance, help to improve occupant health and comfort, reduce long-term energy costs, and create a more resilient built environment for all Minnesotans. Other Midwestern states, including Illinois and Michigan have established a 3-year adoption cycle and it has proven beneficial for the state's climate and energy goals. Energy codes are one of the most cost-effective policies to comprehensively achieve more efficient buildings and help meet the 100% clean energy goals set by Minnesota.

If you have any questions about this testimony or the general impact of energy codes, please contact Nicole Westfall, Building Policy Manager for MEEA at [nwestfall@mwalliance.org](mailto:nwestfall@mwalliance.org) or 312-374-0918.

Sincerely,

Stacey Paradis  
Executive Director  
Midwest Energy Efficiency Alliance