ACEEE Comments on the ICC's Draft 2030 IECC Scope & Intent

February 14, 2026

The International Code Council's (ICC's) International Energy Conservation Code (IECC) plays a unique and essential role in buildings policy in the United States. States and local governments across the country rely on this model code to adopt minimum energy efficiency requirements that reduce home energy bills, protect residents, manage peak electric loads, and support long-term decarbonization goals. The Scope & Intent (S&I) is critical to ensuring the IECC maintains credibility, technical integrity, and widespread adoptability.

States and cities rely on a coherent national model energy code that improves efficiency over time and provides a consistent baseline for both minimum energy performance and long-term energy and affordability goals. A strong model code functions as both a consumer protection tool and an economic development tool by lowering lifetime energy costs for households and reducing operating expenses for commercial and publicly funded buildings.

The proposed Scope & Intent could lead to model codes that fail to meet the needs of states and cities because it could allow the IECC to stagnate or even weaken and it defines a cost-effectiveness methodology that would undermine affordability.

To maintain the IECC's value as a national model code, the S&I must therefore:

- Ensure a predictable trajectory of continuous improvement
- Explicitly prohibit backsliding
- Ground cost-effectiveness in long-term affordability

If the IECC does not meet these criteria, states and partner organizations will increasingly rely on other pathways to meet their energy, affordability, and climate objectives, including state-led code development, alternative model standards, and independent above-code programs.

Critical Changes in the 2030 IECC Draft Scope & Intent

The proposed Scope & Intent would:

- Divide the IECC into two separate codes:
  IECC – establishes minimum requirements for the energy-efficient design and construction of buildings. All electrification, decarbonization, and other advanced energy measures would be moved out of this base code.
  IECC-X – a new, separate version of the code that may include optional or mandatory provisions for additional energy efficiency, greenhouse gas reduction, and zero-energy building measures.

- Remove explicit language committing to incremental efficiency improvement across code cycles[1] and fail to clearly prohibit reductions in efficiency relative to prior editions.
- Define a cost-effectiveness methodology used to evaluate code changes that relies on a simple payback approach rather than a life-cycle cost analysis.

As drafted, this Scope & Intent does not ensure that the IECC will fulfill the criteria needed for a strong model code that meets the diverse needs of the states it serves.

Terminology: For the remainder of these comments, "base IECC" refers to the proposed S&I's "IECC", as distinguished from the newly proposed "IECC-X."

ACEEE Engagement Position

If the 2030 IECC Scope & Intent is finalized as proposed, ACEEE will focus its engagement exclusively on the base IECC.

- The base IECC, if it continues to improve, should remain the primary, widely adoptable efficiency code that states and local governments rely on to advance energy efficiency.
- ACEEE will not comment on or engage with IECC-X or related appendices. Leading states and jurisdictions already have vehicles for above-code options developed outside of the ICC process — including ASHRAE 90.2, Passive House, NBI's code overlays, state and local stretch codes, and the ACEEE-led Pathway to Zero codes. ACEEE will continue to work through those channels rather than engaging with ICC's IECC-X.

Accordingly, the remainder of these comments will focus on improving and preserving the integrity of the base IECC.

Comments on the Draft Scope & Intent of the base IECC

The following recommendations address key changes needed in the Draft Scope & Intent to maintain the base IECC's role as a credible, adoptable, and technically rigorous model code.

1. **The Scope & Intent must explicitly ensure a trajectory of continuous improvement**
   The IECC has historically improved incrementally with each edition, delivering increased energy savings for households, businesses, and consumers. The 2024 IECC's Scope and Intent explicitly states: "The code is updated on a 3-year cycle with each subsequent edition providing increased energy savings over the prior edition."2 The 2030 Draft S&I removes this language and does not commit to incremental efficiency improvement across code cycles. Maintaining improvement over time is also important for federal alignment. Under federal law, the U.S. Department of Energy (DOE)

[1] (https://codes.iccsafe.org/content/IECC2024V1.2/chapter-ce-1-scope-and-administration#IECC2024V1.2_CE_Ch01_SubCh01_SecC101.3).

[2] https://codes.iccsafe.org/content/IECC2024V1.2/chapter-ce-1-scope-and-administration#IECC2024V1.2_CE_Ch01_SubCh01_SecC101.3).

must determine whether new editions achieve greater energy savings than prior versions to support state and local adoption and implementation. Preserving a clear trajectory of continuous improvement is critical for the base IECC to maintain credibility and predictability and serve as a reliable national model code.

Recommendations:

- **Restore explicit language committing to continuous improvement in the S&I.** Specifically, affirm that each edition of the IECC will deliver incremental efficiency gains over prior editions, as specified in the 2024 S&I.
- **Ensure language is enforceable and clear**, so states and local governments can adopt each edition with confidence in long-term energy and affordability outcomes.

2. **The Scope & Intent must explicitly prohibit backsliding**

The 2030 Draft S&I does not clearly prohibit regression (S&I Draft, p. 2). Explicitly preventing reductions in efficiency across code cycles is essential to protect affordability, long-term cost savings, and code adoptability. Without a clear prohibition on backsliding, states and local governments could unintentionally adopt weaker requirements, undermining lifetime energy savings and introducing uncertainty for jurisdictions seeking to adopt new editions consistent with their goals and statutory obligations. A base IECC that weakens over time could also compromise federal alignment and prevent the DOE from making a positive determination on the new edition, halting adoption processes in some states and leaving jurisdictions without the federal support they have long relied on to adopt and implement the IECC. Including a clear anti-backsliding prohibition is critical for the base IECC to maintain credibility and ensure states can adopt each edition with confidence that minimum efficiency requirements will not regress.

Recommendations:

- **Explicitly prohibit regression across code cycles**, ensuring energy efficiency levels do not decrease relative to prior editions.

3. **Cost-effectiveness must be grounded in long-term affordability**

The Draft S&I proposes a cost-effectiveness methodology based on a simple payback approach, evaluating upfront costs and energy savings only within defined maximum payback periods (7-12 years for residential, 10 years for commercial). This flawed approach evaluates investments over a short window that does not reflect how buildings are actually financed or used. Most buildings are financed through typical mortgage or commercial loan terms, not purchased with cash upfront, and are occupied by multiple owners or tenants over the building's lifetime. As a result, it ignores long-term operational savings, differences in measure lifetimes, and energy cost escalation beyond the payback period, raising lifetime energy costs for households and businesses. It also locks future occupants into inefficient designs, exposing them to higher energy costs over decades. The methodology particularly harms those most sensitive to ongoing energy expenses—small businesses, first-time homebuyers, and under-resourced communities. The ICC's proposed approach

is also inconsistent with DOE's established life-cycle framework and undermines DOE's ability to make efficiency determinations across code cycles.

Recommendations:

- **Revise the energy cost-benefit analysis methodology to include a life-cycle cost approach** that evaluates both upfront and long-term operational costs over the life of the building.
- **Ensure cost-effectiveness evaluation aligns with long-term affordability,** considers cash flow relative to typical mortgages or commercial financing, and preserves comparability across code cycles.

Closing Comment: Ensure major methodological changes occur through a consistent and transparent consensus process

The cost-effectiveness methodology and other foundational elements essential to the outcomes of the IECC must be developed through a consistent and transparent process. Processes promoting accountability, transparency, and broad stakeholder engagement ensure that technical and procedural decisions reflect diverse interests, support the code's credibility, and allow states to adopt each edition with clarity on long-term energy and affordability outcomes.

ACEEE urges the ICC to publicly document all comments submitted on the Draft 2030 IECC S&I and the responses provided. Justification for those responses should also be made available, ensuring transparency and accountability in the process.

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