Code Amendment Proposal Form
For public amendments proposed to the 2018 editions of the International Codes

Instructions: Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by April 26, 2019.

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Signature:

AMENDMENT PROPOSAL
Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IECC
If you submitted a separate coordination change to another code, please indicate which code: ____________________________

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<tr>
<td>EBC</td>
<td>International Existing Building Code</td>
<td>IMC</td>
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<td>IFC</td>
<td>International Fire Code</td>
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<td>International Residential Code</td>
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2) Please check here if a separate graphic file is provided: ☐
Graphics may also be embedded within your proposal below.

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is **BOLDING**, **STRIKEOUT** AND **UNDERLINING**. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

**Code Sections/Tables/Figures Proposed for Revision:**
IECC C502.3 New Section

**Note:** If the proposal is for a new section, indicate (new).

**Proposal:**

**C502.3 Performance Option**
**C502.3.1 Existing plus addition compliance (Performance Option).** Where *unconditioned space* is changed to *conditioned space*, the *addition* shall comply where the annual energy cost or energy use of the *addition* and the *existing building*, and any *alterations* that are part of the project, is less than or equal to the annual energy cost of the existing...
building when modeled in accordance with Section C407. The addition and any alterations that are part of the project shall comply with Section C407 in its entirety.

**Supporting Information:**

Reviewers have struggled with complex alteration projects, and we are seeing more and more of them. Direction to teams in the past has been to build an energy model and demonstrate that the project alternation does not increase energy use (C503.1). Then we have to break out the "additions" and demonstrate compliance for those portions separately. It gets extra messy where there are bits of "addition" here and there, especially when a new HVAC system covers both the altered portion and the addition. It's strange and vague, and we don't have a great path.

I'd like the ability to use C407 to demonstrate compliance for these sorts of projects. I would also like a way to encourage projects to improve their insulation, even if they don't *have* to under the C503.1 exception. For those projects, I'd like to be able to use the existing envelope component as a baseline in C407. it would allow us to encourage teams to make more improvements than they might have otherwise.

Lastly, allowing alterations to use C407 (and requiring to get to 15% savings for compliance) should result in more savings than we would typically see, as more attention will be paid to energy usage.

This essentially codifies direction I have received from building officials, so it should make things easier.

ASHRAE 90.1-2016 ECB and Appendix G both have new language to address existing envelope components as well as alterations and additions, but unfortunately this did not get included in C407. Maybe it was intended to be implied.

**Referenced Standards:**

Note: List any new referenced standards that are proposed to be referenced in the code.

**Impact:**

Lower the cost of construction

Note: For each of the following, indicate the impact of this amendment proposal:
- The effect of the proposal on the cost of construction - Increase, Reduce, No Effect
- The effect of the proposal on the cost of design - Increase, Reduce, No Effect
- Is the proposal more or less restrictive than the I-codes - More, Less, Same

**Departmental Impact:** (To be filled out by CPD staff)

Note: CITY STAFF ONLY. For each of the following, indicate the impact of this proposal:
- The effect of the proposal on the cost of review - Increase, Reduce, No Effect
- The effect of the proposal on the cost of enforcement/inspection - Increase, Reduce, No Effect