



December 12, 2017

Diane Stoddard
Assistant City Manager
City of Lawrence, Kansas
City Hall
6 East 6th Street
Lawrence, KS 66044

RE: City of Lawrence 2018 Legislative Policy

Dear Ms. Stoddard:

The 2017 Legislative Policy for the City of Lawrence specifically includes a legislative priority to support state and local renewable energy technologies and energy efficiency improvements.

PROSOCO and Build SMART request that the City of Lawrence adopt a 2018 state and local legislative priority that promotes and supports expanded building energy efficiency improvements in new construction and renovation including in the multifamily housing sector. We would like to see a focused effort to improve and promote Kansas energy efficiency policy and the development of innovative energy efficiency programs. I have outlined broad and specific recommendations that warrant legislative support by the City of Lawrence.

Broad Issues and Recommendations

Discussions about updating building codes including use of the 2015 International Energy Conservation Code (IECC) would be a good first step. A panelist in the September 2017 Kansas Energy Conference sponsored by the Kansas Department of Commerce stated, "Fully implementing the current IECC would generate significant energy savings, create jobs, and promote economic development." We agree.

Innovative energy efficiency programs designed for Kansans are clearly needed. It was pointed out at the energy conference that Kansas is significantly behind others including nearby neighboring states. In September, the American Council for an Energy-Efficient Economy (ACEEE) published its 2017 State Scorecard for energy efficiency. Kansas ranked 48th. (<http://aceee.org/state-policy/scorecard>)

To spark greater industry competitiveness and growth, Kansans need improved building energy efficiency particularly in the multifamily housing sector. If buildings are more

efficient, owners and occupants can apply saved resources to growth or other needs. Occupants also want a healthy living environment, and this is baked into high performing buildings.

Specific Recommendations

- Encourage local adoption of the 2105 International Energy Conservation Code - initially for the multifamily housing sector.
- Adopt policies, programs, and measures to ensure that a high level of energy efficiency is demonstrated in new construction or major renovation where public funds are utilized.
 - Encourage/reward public/private multifamily housing projects that are designed and constructed to voluntarily achieve high performance energy efficiency that meets a third-party evaluated standard such as the Passive House certification program [PHIUS+ 2015: Passive Building Standard-North America – Certification Overview](#).
Passive House:
 - Requires high levels of air tightness and insulation
 - Assures the walls will not mold or rot
 - Provides abundant, fresh virtually allergen-free air for occupants, and
 - Has been adopted by the Affordable Housing agencies of eight states
 - Encourage/reward innovative and cost effective public/private multifamily housing projects that pair high performing energy efficiency design with advanced energy technologies, such as renewable energy, and innovative policies such as an exemption to allow master metering.
Master metering versus Sub-metering:
 - Sub-metering is currently required by the Kansas Corporation Commission for multifamily housing and is a barrier for the cost-efficient use of solar panels on a multifamily development because of the technical and financial challenges presented by integrating the solar array with the numerous individual meters.
 - Regionally, master metering has been permitted (exempted) in Iowa under certain conditions for multifamily housing.
 (Documentation available upon request.)
 - Encourage/reward public/private multifamily housing projects that demonstrate high energy efficiency with an air infiltration blower door test.

Blower door tests:

- Measures the air leakage of a building and are already required by the City of Lawrence for single family homes.
- Blower door tests achieving high energy performance results and are widely required in guidelines and standards in multifamily high energy efficiency buildings.

Examples:

- [RESNET Guidelines for Multifamily Energy Ratings](#) identifies blower door requirements for multifamily homes and is expected to become a standard in 2018.
- USGBC's LEED BD+C: Homes | v4 - LEED v4 identifies [Air Infiltration](#) credits for multifamily homes
- Passive House [PHIUS+ Certification for Multifamily Performance Requirements \(v2.1\)](#) identifies blower door tests requirements.

Feel free to contact me if you have questions at (785) 830-7323. Thank you for your consideration.

Sincerely,



D. Kay Johnson
Sustainability and Environment Manager
PROSOCO
3741 Greenway Circle, Lawrence, KS 66046
kay.johnson@prosoco.com