



# AIA Indiana

A Chapter of the American Institute of Architects

November 11, 2009

Mara Snyder  
Indiana Department of Homeland Security  
Code Services Section  
302 W. Washington St. Room W246  
Indianapolis, IN 46204-2739

Dear Ms. Snyder:

Thank you for the opportunity to provide comments regarding the proposed amendments to ANSI/ASHRAE/IESNA Standard 90.1-2007, Energy Standard for Buildings Except Low-Rise Residential Buildings relative to its adoption as part of the Indiana Building Code.

The American Institute of Architects is committed to the goal of reaching at least a 60 percent carbon emission reduction by 2010 and carbon neutral buildings by 2030; therefore we truly appreciate the Fire Prevention and Building Safety Commission's efforts on the important matter of energy efficiency in buildings. Energy efficiency is a primary concern not only in the interest of environmental health but also as part of a sound economy. In an increasingly competitive market, where return on investment is often a primary criterion, owners, including public entities, must have a reasonable expectation of the impacts of their decisions.

The Standard, as written, contains both prescriptive and performance-based design methodologies. The intent of these protocols is to allow either a simplified design approach that will result in a building that performs nominally better than one designed otherwise, or an optimized design approach that captures synergies and uses strategic tradeoffs to further improve and maximize performance.

Maximizing both the economic and environmental performance of facilities increasingly requires design professionals to take advantage of computer modeling tools. These tools allow the design professional to give facility owners and operators a reasonable estimate of energy performance based on the interaction of the various building systems as designed. Overall fiscal impact has been shown to be minimal and often less expensive than that of prescriptive methods of compliance, while energy savings markedly surpass those resulting by following prescriptive methods.

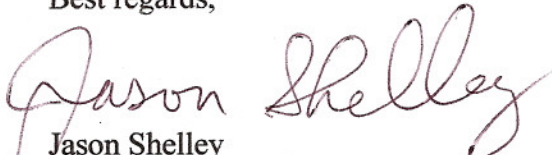
We understand the Commission's charge to protect health, safety and welfare through a clear plan review process. Considering that environmental performance is consistent with this charge, AIA Indiana respectfully requests that in amending and adopting ASHRAE 90.1-2007 the Commission permits design professionals to show compliance with the adopted code through Comprehensive Energy Modeling. Provided below are the two methods showing how this can be achieved. Both methods satisfy the State's requirement that its codes be uniformly enforceable and capable of analysis prior to adoption.

\*Show the prescriptive design requirements of the Code have been met, both in the design described in the submitted Drawings and/or Specifications, and in a Compliance Report from an accepted computer compliance tool such as ComCheck. The Drawings, Specifications and Compliance Report must bear the seal and signature of either an architect or professional engineer registered in the State of Indiana.

\*Submit Drawings and/or Specifications, a Report from a Comprehensive Energy Model and affidavit swearing that the tools used to simulate performance indicate that the submitted design will meet or exceed the requirements of the Prescriptive Method of ASHRAE 90.1-2007. This method relies on the same affidavit model currently used by design professionals whenever they submit any project to Plan Review. Compliance will be shown through the Comprehensive Energy Model Report and must bear the seal and signature of either an architect or professional engineer registered in the State of Indiana.

Once again, your efforts regarding this important issue are truly appreciated. Do not hesitate to contact me if I can answer any questions or be of assistance in any way.

Best regards,



Jason Shelley  
Executive Director

Enclosure