TEXAS A&M ENGINEERING
EXPERIMENT STATION

ENERGY SYSTEMS LABORATORY

August 22, 2014

Dub Taylor, Director
State Energy Conservation Office (SECO)
Texas Comptroller of Public Accounts
111 East 17th Street, #1118
Austin, Texas 78774

Dear Mr. Taylor:

The Energy Systems Laboratory has performed a detailed technical analysis comparing the stringency of the Texas Building Energy Performance Standards (TBEPS), based on Chapter 11 of the 2009 International Residential Code (2009 IRC) for single-family residential construction and Chapter 5 of the 2009 International Energy Conservation Code (2009 IECC) for commercial construction, to the 2015 editions of the IRC and IECC.

The analysis has determined that the residential provisions of the 2015 IECC are more stringent than the Texas Building Energy Performance Standards (TBEPS). The residential provisions in the 2015 IECC are identical to Chapter 11 of the 2015 International Residential Code (2015 IRC).

In the commercial provisions of the 2015 IECC, there are three paths to obtain compliance. The first path is to comply with the requirements of the ASHRAE Standard 90.1-2013. The second and third paths, prescriptive and performance, are to comply with the requirements put forth in Chapter 4 of the 2015 IECC, which includes the commercial provisions. The Laboratory's analysis has determined that the commercial provisions of the 2015 IECC are more stringent than the Texas Building Energy Performance Standards (TBEPS) for all three paths.

The Laboratory will review and consider the comments received by SECO to provide the final recommendation.

Please contact us should you have any questions.

Sincerely,

Jeff S. Haberl, Ph.D., P.E. inactive
Associate Director

Bahman L. Yazdani, P.E.
Associate Director

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