

# **Trends & Potential Disruptions**

### For Insulation Contractors



#### 2018 ICAA Convention & Trade Show

DISNEY'S CONTEMPORARY RESORT SEPTEMBER 13–15 \* ORLANDO, FL

Jay Murdoch, Director of Industry Affairs jay.murdoch@owenscorning.com + 202.680.8915

# **Trends & Potential Disruptions**



### **Impacting Insulation Contractors**

- **1. Residential Codes, Enforcement, RESNET/HERS**
- 2. Regulation
- 3. Legislation
- 4. Market Issues
- 5. So What?



**Issues Impacting Entire Construction Industry** 

- Limited Labor Pool + Hiring Issues
- Tax Code, Health, OSHA, Workman's Comp, etc
- Multi-Family Plateaus and Declines
- Housing Forecasts
- Possible Market Corrections & Timing

### 1. Codes, Enforcement, RESNET



#### **Negative Drag on Insulation Contractor**

- 1. Hold the Line States 2009 IECC
- 2. Weakening Envelope Leakage (ACH)
- 3. HVAC trade off coming back
- 4. Solar & Battery: CA, NV, FL, MA, VT
- 5. No Plan Review / Field Inspections
- 6. Removing Noise Control from IBC/IRC
- 7. Removing Sprinklers from IRC/IBC
- 8. HERS & Balanced Software Outputs
- 9. Emerging Carbon Codes (- or + ???)

#### **Positive Lift for Insulation Contractor**

- **1.** Sprinklers / Floor I-Joist Protection
- 2. R23 Wall Cavity Option to "ci" in CZ6\*
- 3. Stretch Codes (CA, MA, NY)
- 4. CA: Shift to 2x6 Walls in 2019 Energy Code\*
- 5. CA: Solar/Battery; HP Attics; Wildland+Energy
- 6. Tight & Buried Ducts in Attics
- 7. Adoption of Noise Control in IBC/IRC
- 8. BOPs + Leakage Testing for Code Compliance\*
- 9. Emerging Carbon Codes (- or + ???)

# Major Differences: 2009, 2012, 2015, 2018 IECC



#### **Residential – Single Family**

- Fact: Big change, on paper, was between the 2009 & 2012 IECC
- 2015 & 2018 IECC had minor changes in energy efficiency

#### Here's What's New on Paper: (Moving from the 2009 to 2018 IECC)

- New Compliance Path: Energy Rating Index (2015 IECC; weakened in 2018 IECC)
- Envelope Requirements Improved (2012 IECC)
- Envelope Air Leakage Improved (2012 IECC)
- **Solar Introduced** but with Conditions (2018 IECC)
- Tight & Buried Ducts Accepted (2018 IECC)
- IRC: Floor I-Joist Protection / Sprinklers in Concealed Spaces (only if adopted locally)



S DOE Map

<u>Note</u>: US DOE Map looks at the overall level of energy efficiency of a State energy code.

This is not a good barometer for the insulation contractor

Source: US DOE https://www.energycodes.gov/adoption/states



# **Envelope R-values Have Plateaued in the IECC**



Climate				Cei	ling								Wall			
Zone	2006	2009	2012	2015	2018	2021	2024	NZE	2006	2009	2012	2015	2018	2021	2024	NZE
1	30	30	30	30	30	30	30	30	13	13	13	13	13	13	13	19/13+5
HERS/ERI	97	79	74	52	<u>57</u>	?	?	?	97	79	74	52	<u>57</u>	?	?	?
2	30	30	<u>38</u>	38	38	38	38	38	13	13	13	13	13	13	13	19/13+5
HERS/ERI	96	79	73	52	<u>57</u>	?	?	?	96	79	73	52	<u>57</u>	?	?	?
3	30	30	<u>38</u>	38	38	38	38	38	13	13	<u>20</u> /13+ <u>5</u>	20/13+5	20/13+5	20/13+5	20/13+5	21/13+7.5
HERS/ERI	94	78	71	51	<u>57</u>	?	?	?	94	78	71	51	<u>57</u>	?	?	?
<b>4</b> (ex Marine)	38	38	<u>49</u>	49	49	49	49	60	13	13	<u>20</u> /13+ <u>5</u>	20/13+5	20/13+5	20/13+5	20/13+5	21/13+7.5
HERS/ERI	92	82	76	54	<u>62</u>	?	?	?	92	82	76	54	<u>62</u>	?	?	?
4 Marine & 5	38	38	<u>49</u>	49	49	49	49	60	19/13+5	<u>20</u> /13+5	20/13+5	20/13+5	20/13+5	20/13+5	20/13+5	30 dbl wall / 19+10
HERS/ERI	91	82	80	55	<u>61</u>	?	?	?	91	82	80	55	<u>61</u>	?	?	?
6	49	49	49	49	49	49	49	60	19/13+5	<u>20</u> /13+5	20+ <u>5</u> / 13+ <u>10</u>	20+5 / 13+10	20+5 / 13+10	20+5 / 13+10	20+5 / 13+10	40 dbl wall / 19+20
HERS/ERI	92	83	79	54	<u>61</u>	?	?	?	92	83	79	54	<u>61</u>	?	?	?
7 & 8	49	49	49	49	49	49	49	60	21	21	20 <u>+5 /</u> <u>13+10</u>	20+5 / 13+10	20+5 / 13+10	20+5 / 13+10	20+5 / 13+10	40 dbl wall / 19+20
CZ7 HERS/ERI	93	85	78	53	<u>58</u>	?	?	?	93	85	78	53	<u>58</u>	?	?	?
CZ8 HERS/ERI	96	86	79	53	<u>58</u>	?	?	?	96	86	79	53	<u>58</u>	?	?	?

### Air Leakage Requirements by Code, Standard, Program



Climate Air Leakage Requirements expressed in Air Changes per Hour/50 Pascal (ACH50)

Zone	2006 IECC	2009 <sup>1</sup> IECC	<b>2012-2018</b> IECC <sup>2, 3, 4</sup>	ASHRAE 90.2	Energy Star <sub>v3</sub>	<u>Energy</u> Star <sub>v3.1</sub>	<b>LEEDv4</b> 1 Point	<b>LEEDv4</b> 2 Points	<u>DOE</u> ZERH	OC NZE	PHIUS 2015 <sup>5</sup>
1-2	Visual	<7	≤5	n/a	≤6	≤3	4.25	3	≤3	≤5	0.6
3-4	Visual	<7	≤3	n/a	≤5	≤2.5	3.5	2.5	≤2.5	≤2	0.6
5-7	Visual	<7	≤3	n/a	≤4	≤2	2.75	2	≤2	≤0.6	0.6
8	Visual	<7	≤3	n/a	≤3	≤1.5	2	1.5	≤1.5	≤0.6	0.6

1. verify by either visual inspection or testing 2. 2015 IECC test stds.: ASTM E779 or ASTM 1827 3. 2018 IECC: RESNET/ICC 380, ASTM E779 or ASTM 1827 4. NGBS/ICC 700 = 2015 IECC 5. Passive House spec

#### Like Envelope Rs, ACH is often weakened in Code State/Local Adoptions

OC NZE: Owens Corning Builder Guide, Net Zero Energy spec

jay.murdoch@owenscorning.com - Sept 2018





# Major Change! Solar in the Energy Code with Battery in the Pipeline



THE PINK PANTHER™ & © 1964-2008 Metro-Goldwyn-Mayer Studios Inc. All Rights Reserved. © 2008 Owens Corning.



# **New Kid in the Sandbox: Solar** (with Battery as Fast Follower)



	2015 IECC					
	Prescriptive					
	(Subject to trade-off)					
Climate Zone	Ceiling	Wall				
1	30	13				
2	<u>38</u>	13				
3	<u>38</u>	<u>20</u> /13 <u>+5</u>				
4	<u>49</u>	<u>20</u> /13 <u>+5</u>				
4 Marine & 5	<u>49</u>	<u>20</u> /13 <u>+5</u>				
6, 7, 8	49	20 <u>+5</u> / 13 <u>+10</u>				

For the 1<sup>st</sup> time, solar is included in the 2018 IECC (in the ERI path only) as an optional energy conservation measure just like HVAC equipment, hot water heaters, windows, insulation and air sealing. Solar is not permitted in the other paths.

#### <u>Context</u>

Requirements in <u>underline</u> represent an increase from the 2009 IECC.

Examples:

- R38 was R30 under the 2009 IECC
- R20 was R13 under the 2009 IECC

<u>Flat Envelope R-Values:</u> The 2012, 2015, and 2018 IECC Envelope Rs are identical and will likely remain the same in the 2021 IECC.



### Solar as Trade-Off with a Backstop of the **2009 IECC Envelope Requirements**



	2015 Prescr	<b>IECC</b> riptive	IECC with Solar PV with 2009 IECC		
	(Subject to	trade-off)	Back-Stop		
Climate Zone	Ceiling Wall		Ceiling	Wall	
1	30	13	30	13	
2	<u>38</u>	13	30	13	
3	<u>38</u>	<u>20</u> /13 <u>+5</u>	30	13	
4	<u>49</u> 🥌	<u>20</u> /13 <u>+5</u>	38	13	
4 Marine & 5	<u>49</u>	<u>20</u> /13 <u>+5</u>	38	20/13+5	
6, 7, 8	49	20 <u>+5</u> / 13 <u>+10</u>	49	20/13+5	

Initial Proposal: Allow solar to be used as a trade-off against envelope insulation – BUT with the 2009 IECC as a backstop.

Example: In Climate Zone 4, ceilings could go from R49 to R38, and walls from R20 to R13 if solar is used to meet the energy code.

Attractiveness to Builders: In a Builder's cost-tobuild metric, rather than the consumers cost-tooperate metric, leveraging 1) federal, state, and local tax credits, 2) utility incentives, and 3) creative financing for solar drives the builders cost-to-build to meet the energy code down – to nearly zero or cash positive in some markets. Plus, Solar & Batteries are sexy to consumers,... attic insulation isn't

ay.murdoch@owenscorning.com



# What Unrestrained Solar with No Backstop Looks Like

	<b>2015</b> Presci ( <i>Subject to</i>	<b>IECC</b> riptive <i>trade-off</i> )	IECC with with 20 Back	<b>Solar PV</b> 09 IECC -Stop	IECC with Solar PV* Unconstrained ( <u>no</u> 2009 IECC Back-Stop)	
Climate Zone	Ceiling	Wall	Ceiling	Wall	Ceiling	Wall
1	30	13	30	13	<30	<13
2	<u>38</u>	13	30	13	<30	<13
3	<u>38</u>	<u>20</u> /13 <u>+5</u>	30	13	<30	<13
4	<u>49</u>	<u>20</u> /13 <u>+5</u>	38	13	<38	<13
4 Marine & 5	<u>49</u>	<u>20</u> /13 <u>+5</u>	38	20/13+5	<38	<20/13+5
6, 7, 8	49	20 <u>+5</u> / 13 <u>+10</u>	49	20/13+5	<49	<20/13+5

Another Proposal: Allow solar into the code with <u>no</u> <u>limits</u>.

#### Trade-Off Example

In Florida (CZ2), it's feasible through software modeling to reduce walls to R-7 and attics to R-18 with unrestrained solar and no backstops for the envelope, ACH, or other baseline energy savings measures. The added impact of battery storage was not modeled.

jay.murdoch@owenscorning.com

\* Hypothetical reductions are possible with unrestrained solar but may be unlikely due to potential comfort issues.



# **Grand Compromise:** Permit Solar in ERI Path with Conditions



	2015 IECC				
	Prescriptive				
	(Subject to	o trade-off)			
Climate Zone	Ceiling	Wall			
1	30	13			
2	<u>38</u>	13			
3	<u>38</u>	<u>20</u> /13 <u>+5</u>			
4	<u>49</u>	<u>20</u> /13 <u>+5</u>			
4 Marine & 5	<u>49</u>	<u>20</u> /13 <u>+5</u>			
6, 7, 8	49	20 <u>+5</u> / 13+10			

#### What's in the 2018 IECC:

- 1. Solar may only be used in the Energy Rating Index (ERI) path
- 2. Solar is not permitted in the Prescriptive or other Performance paths.
- 3. If solar is used, then the 2015 IECC prescriptive envelope requirements must be met as a *mandatory* <u>minimums</u>
- 4. No trade-offs are permitted against the envelope

2018 IECC with Solar 2015 IECC Prescribed R-Values are Mandatory						
Ceiling	Wall					
30	13					
38	13					
38	20/13+5					
49	20/13+5					
49	20/13+5					
49	20+5 / 13+10					

jay.murdoch@owenscorning.com



### Tight & Buried Ducts Equal to Ducts in Conditioned Space Equals Low Cost HERS Points (NAHB Proposal)

### New in 2018 IECC But Being Adopted in States Now!





## **Cost-Effective Option for Builders**

How to get energy savings/HERS points and meet/exceed the energy code at low cost?

**Goal:** reduce energy consumption associated with HVAC systems in residential applications (thermal losses, duct leakage)



**Negative Aesthetics** 



#### Get points for ducts in conditioned space at lower cost!



- Ducts placed on the ceiling drywall or over the bottom truss chords.
- Attic insulation covers (buries) the ducts.
- Reduces thermal losses from ducts located in vented attics.



# ROI of Tight & Buried Ducts – even in California's Net Zero Energy Code



Completed by ConSol using the 2019 research CBECC-Res software, CEC's 2-story 2,700ft<sup>2</sup> prototype home in CZ12 (Sacramento). Cost analysis used ConSol's estimated material and labor cost database.

- · ·
- Based on California Energy Code
- Buried ducts provide a reduction in EDR at reasonable cost

**Buried ducts ranks 3<sup>rd</sup> in list of features based on EDR/\$100 spent** falling below 16 SEER/14 EER HVAC (1<sup>st</sup>) and Ducts in Conditioned Space (2<sup>nd</sup>).



## **Builder Value Proposition: Buried Ducts**

traditional

attic

#### Builder Costs (Steve Winter Assoc Report)

\$380

	Partially Buried	Fully Buried	Deeply Buried	Unvented ccSPF	Encap- sulated	Paruany Buried and Encap- sulated	Fully Buried and Encap- sulated	Deepty Buried and Encap- sulated	Interior Ducts
R-30 ccSPF Roof Deck*				\$8,363					
Encapsulated ducts <sup>a,b</sup>					\$1,678	\$1,678	\$1,678	\$1,678	
Partially Buried (R-33 Fiberglass) <sup>e</sup>	\$95								
Fully Buried (R-42 Fiberglass) <sup>6</sup>		\$380							
Deeply Buried (R-51 Fiberglass)			\$665						
Partially Buried and Encapsulated (R-37 Fiberglass) <sup>c</sup>						\$222			
Fully Buried and Encapsulated (R-46 Fiberglass) <sup>c</sup>							\$507		
Deeply Buried and Encapsulated (R-54 Fiberglass) <sup>c</sup>								\$760	
Interior Ducts <sup>4</sup>									\$1,680
Total Cost	\$95	\$380	\$665	\$8,363	\$1,678	\$1,900	\$2,185	\$2,439	\$1,680
Incrementa Cost over	1			1			5		- #

\$8,363

#### **Steven Winter Associates**



#### **Home Innovation Lab**

*"If cost savings from monetizing the* reduced duct area and smaller capacity systems are included, the proposed solution [Buried Ducts] could realistically be a no-cost option."

\*This is based on ccSPF. Most attics today are using ocSPF, so cost is <\$5,000

\$2,050

\$1,680



## **Builder Resources – Buried Ducts**

- 1. Home Innovation Lab TechSpec (How To): http://information.insulationinstitute.org/buried-ducts/buried-ducts-installion-guide
- 2. Home Innovation Lab Builder Value Proposition: http://information.insulationinstitute.org/buried-ducts/buried-ducts-brochure
- 3. Home Innovation Lab YouTube (Understanding Code): <u>http://information.insulationinstitute.org/buried-ducts/buried-duct-system-benefits</u>
- 4. US DOE Building America Solution Center: <u>https://basc.pnnl.gov/resource-guides/ducts-buried-attic-insulation#quicktabs-guides=0</u>
- 5. **RESNET Conference Presentation**:

http://conference2018.resnet.us/data/energymeetings/presentations/Buried%20Ducts% 20-%20RESNET%20Conference%202018%20-%20Final.pdf



### The IRC and NFPA 13 Sprinklers & Concealed Spaces





### NPFA 13 – Sprinkler Exception for Concealed Spaces

Chapter 8 (8.15.1.2): Concealed spaces not requiring sprinkler protection

#### Figure 1: NAIMA Recommendations For Insulated Spaces Above Ceilings



NAIMA's recommendation is to the fill cavity between the ceiling finish and the subfloor with noncombustible fiber glass or rock or slag wool insulation.

jay.murdoch@owenscorning.com

https://insulationinstitute.org/wp-content/uploads/2015/12/BI504.pdf

- Insulate concealed cavities instead of sprinklering them
- Cost Savings option to fully sprinklered spaces
- Dependent on IRC & IBC adoptions
- <u>Builders remove sprinkler requirements</u> in local code adoptions



Fiber Glass and Mineral Wool Insulation as an Alternative to Sprinkler Systems

#### Reduce Construction Costs Using Fiber Glass and Mineral Wool Insulation to Omit Sprinklers in Concealed Spaces

There are three basic approaches used in building codes to provide fire safety - detection, suppression, and containment. No single measure guarantees protection in a fire event. Balanced fire protection design blende detection (or a fire

notification and safe egress. Passive g fire protection systems, including fireblocking material, are installed to resist the free passage of flames and smoke to other areas of the building through concealed spaces. Fiber glass, rock and slag wool insultion materials are ideally



## The IRC and Wood I-Joist Protection



#### OWENS CORNING ® INNOVATIONS FOR LIVING®

# **IRC – Fire Protection of Floors**

#### **IRC R302.13** - Mineral Wool as Option to Dimensional Lumber or Equal

• Equivalency option: ICC-ES Acceptance Criteria 14 - Prefabricated Wood I-joists FIRE PROTECTION OF FLOORS FP-04

#### Fire Protection: Mineral Wool Insulation

The following fire resistance design is an alternative to the 2-by-10 dimensional lumber prescribed in Exception 4 of 2012 IRC Section R501.3 and 2015 IRC Section R302.13 with demonstrated equivalent fire performance.



#### AC-14 Covers

- Fire Test E119
- Durability
- Corrosion Test
- Impact on I-Joists

### 2. State & Local Regulation



- 1. REGGI States (MD-New England) driving energy efficiency (R-PACE)
- 2. CA + PacNW Climate Policy (+CA SB100) with New England Copy Cats
- 3. CALGreen Adoption by Cities/Counties exceeding Energy Code
- 4. Multi-Family: Affordable Housing Embrace of EE/Green/Passive House
- 5. Regulatory Stall Processes to Delay/Limit Code Updates
- 6. Ratepayer Waste: Utility New/Existing Home Programs that Don't Work
- 7. Utility & Tax Incentives for Solar & Battery (shift builder spec/paths)
- 8. Neglected: Utility Rate Case Interventions by Insulation Industry

### 3. State & Federal Legislation



- 1. <u>Codes</u>: 6 Year Cycle; Unbalanced Code Councils; Cost Tests; Limit Home Rule
- 2. <u>Solar + Battery</u>: Legislative mandates; efforts to amend code to allow unrestrained use
- 3. Progressive States: Stretch, Net Zero, Low Carbon Codes. Possibly Retrofit (R-PACE)
- 4. <u>Less Progressive States</u>: Hold the Line or Roll Back on Codes
- 5. <u>CA Existing Homes</u>: Post 2020 Election Tax Credit & R-PACE Expansion
- 6. <u>Federal Message Bills</u>: planting seeds for post 2020 elections
- 7. <u>Federal 45L/25e</u>: Watch RESNET & ACEEE proposals. Limits compliance to ERI path
- 8. <u>Federal (SAVE Act)</u>: Legislation or via Administrative Executive Order

### 4. Market Issues



- **1.** Indoor Air/Environmental Quality in Homes: on Builder's Radar\*
- 2. Mineral Wool Batts: watch New England per penetration
- 3. Commercial GCs Bringing Insulation In-House per Cycle Time Demands\*
- 4. EE Modeling Software and HERS Scores & Market Inconsistency
- 5. Multi-Family: Sound & Noise Control; Green/Passive in Affordable Housing\*
- 6. Next Gen Product Specs: Focus on EPDs, Embodied Energy & Carbon\*
- 7. Watch Passive House Trend (Multi-Family will lead Single-Family)
- 8. Components / Panelization / Modular / Off-Site
- 9. No Insulation Industry PR Campaign like Wood & Concrete/Masonry Industries\*



# Looming Trend: Zero Energy Homes Far Off Trend: Passive House by Early Adopters



### **Passive House: Sample Envelope R-Values**



Zone	Example City	Wall	Ceiling
1	Miami	R19 - 27	R44 - 60
2	Phoenix	R19 - 27	R30 - 70
3	Sacramento	R13 - 31	R30 - 60
3 Marine	San Francisco	R19 - 23	R30 - 38
4	Baltimore	R31 - 51	R49 - 80
4 Marine	Seattle	R31 - 43	R60 - 70
5	Providence RI	R31 - 43	R60 - 70
6	<b>Burlington VT</b>	R39 - 51	R70 - 90
7	Duluth MN	R49 - 65	R80 - 90
8	Fairbanks	R89	R120

### Passive House Trend



### **Multifamily & Commercial**

- First to Adopt in Volume
- Affordable/Low Income Housing
- Baked into State QAPs
- NYC & Washington DC Leading
- Ripe for Panelized & Modular
- Bleed over to Private MF Specs

### Single Family - will Lag MF

- "Heat Home with a Hair Dryer"
- Early Adopters are Young Turks
- Not Traditional NAHB Members
- New England, CA/NW are Ripe
- NY Stretch Code
- Perceived Threat to Some



- **1. Codes** <u>Envelope Reductions & Trade-Offs</u>; <u>Envelope Leakage Weakened</u>; Solar & Battery; <u>Noise Control</u>; <u>Sprinkler Adoption</u>; Floor I-Joist Protection; Stretch Codes; Tight & Buried Ducts; Unvented Attics with Air Permeable Insulation; Enforcement Wild-Card
- 2. Regulation 6 year Code Cycles; Unbalanced Code Councils; Cost Tests
- **3. Legislation** CA Solar/Battery Mandates; Stretch Codes; Climate; CA Existing Homes Retrofit post 2020+; <u>Residential PACE (retrofit); A Real SAVE Act or Exec Order</u>
- **4. Market Issues** Environmental/IAQ; <u>Compliance choices due to limited labor</u>; Components/Panelizing; Mineral Wool; <u>Sound Control</u>; <u>No Industry PR Campaign</u>



# Discussion

Jay Murdoch, Director of Industry Affairs

jay.murdoch@owenscorning.com + 202.680.8915



# Appendix

Jay Murdoch, Director of Industry Affairs

jay.murdoch@owenscorning.com + 202.680.8915



#### **Process Repeats at State Level**

Source: http://www.iccsafe.org



### **Being the Advisor to the Builder**

## **Insulation Contractor as Builder Advisor**

#### The Builder's Advisor

- Today: HERS Rater is the Builder's Advisor on Code, Specs, Incentives
- Rater does Energy Modeling & Provides Solution Options
- Rater is the On-Site Traffic Cop Inspecting & Testing Your Work
- The Spectators? HVAC, Plumbing, Framing, and Insulation Contractors

### Design Phase: Energy Code, Energy Star, Utility Compliance

- 1. <u>Goal</u>: Develop compliance paths that feature your offering (not other trades) & builder metric
- 2. <u>Tools</u>: ResCheck, RemRate, EnergyGauge, or Builder Option Packages (BOPs) by OC
- 3. Out Source 1st: test a partnership with a Rater to develop compliance path options
- 4. Bring In-House: after test, start to grow or add capacity internally over time

#### Test & Inspect Phase (Best place to start)

- 1. <u>Goal</u>: start inspecting & testing your own work (blower door testing)
- 2. Rater Required: Only with Energy Star, DOE ZERH, LEED, ERI Path
- 3. Rater Not Required: The IECC does not Mandate use of Rater to inspect/test
- 4. Most Building Depts just want a # per Envelope & Duct leakage testing
- 5. BPI's Infiltration & Duct Leakage Cert (IDL) is a low pain & low cost entry point



## Tailor Your Offering to Compliance Paths Used



	IECC Compliance Path Options							
Characteristics	Prescriptive	Prescriptive UA Alternative	Performance	Energy Rating Index (ERI)				
% used in Your Market	<mark>25%?</mark>	<mark>35%?</mark>	<mark>40%?</mark>	<mark>0%?</mark>				
Typical Builder using this path	Small	Small/Medium	Medium/Large	n/a				
Must Meet Mandatory Requirements	Yes	Yes	Yes	Yes				
Requires Software	No	An Option (REScheck)	Yes	Yes				
IECC Requires Third Party Verification?	No	No	No	Yes				
Impacts Builder & Subs Cycle Times	No	No	Мау	Yes				

Primary Source: https://www.proudgreenhome.com/blogs/the-energy-code-compliance-conundrum/