OCTOBER 15, 2025, BUILDING REVIEW BOARD MEETING POSITION STATEMENTS & WRITTEN COMMENTS

<u>E25-1294 Receive the Illinois Stretch Energy Code presentation and accept public comments</u>

POSITION STATEMENT

SUPPORT

1. Name

OPPOSE

1. Dan Jurjovec (Naperville)

WRITTEN COMMENT ONLY

- Joseph Hus (Naperville) I strongly support the building stretch codes. They lower the
 total cost of home ownership while improving sustainability. They lower electricity peaks
 which lowers the cost of electricity for all businesses and customers. They will help
 Naperville reduce our greenhouse gas emissions, lower utility costs, and improve indoor
 air quality. Stretch codes drive innovation in building design and materials. Naperville
 should be a leader.
- 2. Cheryl Lee (Naperville) Northern Illinois Homebuilders Association

Northern Illinois Home Builders Association 3695 Darlene Court, Suite 102 Aurora, Illinois 60504 630.978.9000 info@nihba.com

October 13, 2025
Naperville Building Review Board
City of Naperville
400 S. Eagle Street
Naperville, IL 60540

RE: Opposition to Adoption of the Stretch Energy Code

Dear Members of the Building Review Board,

On behalf of the Northern Illinois Home Builders Association (NIHBA), I am writing to respectfully urge the Naperville Building Review Board to oppose the adoption of the Illinois Stretch Energy Code.

As an organization representing hundreds of residential construction professionals across Northern Illinois, we fully support sustainable, energy-efficient building practices. However, we have serious concerns about the proposed stretch code's impact on housing affordability, construction feasibility, and its limited benefits relative to its costs. The Stretch Energy Code imposes requirements that exceed the 2021 International Energy Conservation Code (IECC), which Illinois already follows. These additional mandates significantly increase construction costs—by thousands of dollars per home—without delivering proportional energy savings. In a time when housing affordability is already strained, these added expenses will be passed on to homebuyers, further pricing

many families out of the Naperville market.

Moreover, many of the technologies and building practices required under the stretch code are not yet widely available or practical for all builders, especially in northern climates. This will disproportionately impact small and mid-sized builders, stifle innovation, and reduce competition in the marketplace.

We strongly believe that energy efficiency improvements should be achieved through incentive-based programs and market-driven innovations, rather than through prescriptive, one-size-fits-all mandates.

We urge the Building Review Board to consider the broader implications for housing affordability, builder viability, and consumer choice, and recommend against adopting the stretch code in Naperville.

Thank you for your time and your continued efforts to support responsible, balanced building policies.

Sincerely,

Cheryl Lee

President

Northern Illinois Home Builder's Association

3. Lantz Rakow (Carpentersville) I am an insulation contractor and a licensed hers rater. I have personally done residential energy modeling on over 18,000 homes. As an insulation contractor the stretch code would be beneficial, but from an energy savings perspective i could not justify the cost to my customers. I ardently believe in energy efficiecy, but i have also learned that blindly adding more insulation is not always better. We are approaching the point of no return on what we are trying to achieve. The cost to building by the stretch codes versus the benefit of the energy savings is "not there" to the point of being a burden and not a benefit to potential home buyers. Even if utility costs double, it still doesn't make sense.

Conductive losses through building components under current code requirements are minimal. Convective losses have been reduced dramatically over the last few code cycles with the added attention given to air barriers and detailed air sealing of the enclosures. This by itself has had the largest impact in reducing energy usage and has been relatively inexpensive to accomplish. Furnace and air conditioners have become very efficient with proper sizing of the equipment and improved duct installation and sealing. We have come a long way in a short time.

Conversely, I feel there is room for improvementin building energy efficient homes, but it can be accomplished at a fraction of the cost through framing details and improved insulation installation and not by completely changing wall assemblies which the stretch codes would require.

The current illinois energy conservation code bty itself was a "game changer" and had a large impact on building costs and at the same time created a lot of confusion among builders and code officials alike with little warning from the state and a short amount of time given to both parties to understand and enforce the code. We need to pause.

- 4. Bruce Jones (Naperville) NEST- I support the adoption of stretch codes for Naperville, especially for the business / commercial EV charging station codes
- 5. Levitan (Naperville) My wife and I are 41 year residents of Naperville. We strongly support the adoption of Illinois stretch codes to increase energy, efficiency. We also support adoption of the IL stretch codes because we believe they will be good for our local environment, keeping our air and water cleaner. Energy efficient homes and businesses just make good environmental sense so let's get on the right side of this issue and serve as a model for communities across the region and the nation

- 6. Michael McNally Indiana, Illinois, Iowa, Foundation for Fair Contracting/ IUOE Local 150- Dear Members of the Naperville Building Review Board, The Indiana, Illinois, Iowa Foundation for Fair Contracting (III FFC) is a 501(c)(5) nonprofit construction industry advocacy organization guided by a joint board of trustees representing the International Union of Operating Engineers, Local 150 (Local 150) and its signatory contractors. Local 150 represents approximately 23,000 heavy equipment operators and ancillary industry members performing work for more than 1,000 contractors in and around Chicago. The III FFC is committed to promoting fair and efficient contracting practices in support of responsible contractors and keeping skilled workers employed on jobsites. On behalf of our members, the III FFC respectfully submit these comments opposing the proposed Illinois Stretch Energy Code adoption. While we support efforts to improve energy efficiency and reduce long-term costs, we have significant concerns about the proposed adoption of the Stretch Energy Code in Naperville.
 - 1. Impact on Fuel Choice and Consumer Costs

The Stretch Code is structured in ways that strongly favor electrification over natural gas, particularly through its crediting systems and compliance pathways. This effectively reduces fuel choice for residents and businesses. Natural gas remains a reliable, affordable, and resilient energy source, especially for heating, cooking, and industrial applications. Restricting its use would raise costs for families, limit consumer options, and place additional financial pressure on local businesses that rely on existing gas infrastructure.

- 2. Grid Reliability and Infrastructure Strain
- Mandating or indirectly requiring all-electric construction will significantly increase demand on the electric grid. Without corresponding investment in distribution and transmission capacity, this could lead to reliability challenges and higher utility rates. Naperville's municipal electric system and its contractual ties through IMEA make this issue particularly complex, as capacity constraints and pricing are not easily adjusted in the short term.
- 3. Economic Competitiveness, Housing Affordability, and Local Jobs Adopting the Stretch Code would increase construction and compliance costs, discouraging investment in new residential and commercial projects. Higher costs will make it more difficult to deliver affordable housing and may slow local development.

In addition, Naperville's economy benefits from skilled labor and tradespeople who install, maintain, and service gas systems. Limiting natural gas use would reduce work opportunities for operating engineers, licensed plumbers, pipefitters, HVAC professionals, and contractors who specialize in gas infrastructure. These are stable, middle-class jobs that support local families and apprenticeship programs. Policies that narrow the range of building systems and technologies directly affect the workforce that builds and maintains them.

We therefore urge the Board to:

- Retain the base Illinois Energy Conservation Code as adopted by the State, rather than opting into the Stretch Code.
- At minimum, ensure any future recommendation preserves fuel neutrality, allowing builders and consumers to continue using natural gas where it is the most cost-effective and reliable option.
- Require a full cost-benefit and job impact analysis before considering adoption, including impacts on grid capacity, consumer energy bills, workforce demand, and local economic development.

Thank you for considering these comments. We respectfully request that Naperville

maintain flexibility in its building codes and avoid policies that would unnecessarily restrict natural gas use or harm the workers and families who depend on it.