American Council for an Energy-Efficient Economy
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February 3, 2026

Neighborhood Planning and Development Committee
City Council of Kansas City
414 E. 12th Street
Kansas City, MO 64106
public.testimony@kcmo.org

RE: Public testimony in support of Resolution 260137 and in opposition to 260144

Dear Chairperson Parks-Shaw, Vice Chair Bunch, Councilmember Willett, Councilmember Patterson Hazley,

The American Council for an Energy-Efficient Economy (ACEEE) tremendously appreciates Kansas City's leadership to date advancing cost-saving building energy codes, through adoption and implementation of the 2021 International Energy Conservation Code (2021 IECC). **We respectfully urge you to support Resolution 260137, which will continue the progress made by the Council to lower energy costs for hardworking residents, and reject Ordinance 260144, which if passed would have the opposite effect.**

ACEEE is the premier national energy efficiency research, education, and advocacy non-profit organization. With our independent analysis, we aim to build a vibrant and equitable economy – one that uses energy more productively, reduces costs, protects the environment, and promotes the health, safety, and well-being of everyone. ACEEE has significant expertise when it comes to the development of, and the benefits from, residential and commercial building energy codes, including as a voting member of the 2024 IECC Residential and Commercial Consensus Committees. ACEEE also regularly publishes the City Clean Energy Scorecard. **The most recent version had Kansas City rising 10 spots in the rankings to 26th nationally, in part due to points earned for adopting 2021 IECC.**[1]

Reversing implementation of 2021 IECC, which ordinance 260144 would do, will cost Kansas City households money. According to the United States Department of Housing and Urban Development (HUD) and United States Department of Agriculture's (USDA) final determination regarding building energy codes, households in Climate Zone 4, which includes Kansas City, will save more than $1,200 annually from meeting 2021 IECC as compared to 2009 IECC.[2] Those annual energy savings will exceed the additional costs from downpayment and financing, known as net positive cash flow, for an average lower-income homebuyer using FHA support to purchase a home during just their 15th month inside the home.

These savings are particularly important for those low-income homebuyers. According to 2019 data from the American Housing Survey, **the median low-income homeowner in Kansas City spent more than 8% of their income on energy for their home**, significantly exceeding the national median energy burden for households of around 3%.[3] Neglecting to address high energy costs will perpetuate a cycle of financial strain that forces families to make impossible choices between basic necessities like food, medicine, and

[1] https://www.aceee.org/sites/default/files/pdfs/2024_City_Scorecard_OnePagers/Kansas%20City.pdf
[2] https://www.federalregister.gov/documents/2024/04/26/2024-08793/final-determination-adoption-of-energy-efficiency-standards-for-new-construction-of-hud--and
[3] https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html

maintaining a habitable living environment. Putting in insulation and ensuring adequate sealing of ducts and other leaky areas to deliver those significant savings is a lot easier and more cost effective when the home is being built, avoiding costly retrofits.

Maintaining updated building energy codes won't just save Kansas City families and businesses money, it could also save lives. Analysis by the Pacific Northwest National Laboratories (PNNL) showed that if the power were to go out during a cold snap in a climate comparable to Kansas City**, homes built to 2021 IECC could more than *double* the amount of time residents would be able to stay safe and comfortable inside**.[4] During the recent Winter Storm Fern at least two people tragically lost their lives *inside their own homes* in exactly this situation.[5] Implementation of up-to-date building codes appears to be contributing to a significant increase in wall cavity insulation in Missouri homes over the last year, helping prevent similar occurrences.[6]

Opponents of this common-sense approach to building in Kansas City have alleged costs based in part on **claims for building measures that are *not required to meet 2021 IECC***.[7] The cost estimates made by PNNL for the HUD and USDA final determination, and other estimates like those by the Metropolitan Energy Center, have been verified by actually soliciting bids for materials after the implementation of 2021 IECC in jurisdictions including Kansas City, and reported actual home construction costs are even lower.[8] Opponents are now misrepresenting data about home construction permits, for instance by cherry-picking a single month in which to make a claim. Permit numbers vary considerably by month, but there are no significant negative trends in permits in construction in jurisdictions that have adopted updated codes.[9]

While continuing to implement 2021 IECC will improve energy efficiency, lower housing costs for families, keep more money within the community, and could even save lives, adopting 2024 IECC could further that progress.[10] Regardless of whether you support or oppose IECC 2021, if there is one thing we can agree on it is that 2024 IECC represents an improvement.[11] We therefore respectfully urge you to pass Resolution 260137 to help start the process of adopting 2024 IECC, and reject Ordinance 260144 which would take Kansas City in the opposite direction. As always we stand ready to help the Council continue to lower costs and make progress in improving energy efficiency across every facet of your work on behalf of the community.

Sincerely,
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[4] https://www.energycodes.gov/sites/default/files/2023-07/Efficiency_for_Building_Resilience_PNNL-32727_Rev1.pdf
[5] https://www.aceee.org/blog-post/2026/01/our-homes-arent-ready-extreme-cold-and-power-outages
[6] https://www.linkedin.com/feed/update/urn:li:activity:7417616892024074240?commentUrn=urn%3Ali%3Acomment%3A%28activity%3A7417616892024074240%2C7417760578024423424%29&dashCommentUrn=urn%3Ali%3Afsd_comment%3A%287417760578024423424%2Curn%3Ali%3Aactivity%3A7417616892024074240%29
[7] https://www.aceee.org/fact-sheet/2025/09/nahbs-fictitious-building-code-cost-claim
[8] https://imt.org/resources/cost-effectiveness-of-the-residential-provisions-of-the-2021-iecc-2/
[9] https://www.regulations.gov/comment/HUD-2023-0034-0220
[10] https://www.federalregister.gov/documents/2024/12/30/2024-31024/determination-regarding-energy-efficiency-improvements-in-the-2024-international-energy-conservation
[11] https://www.nahb.org/blog/2025/02/2024-iecc-cost-analysis