



October 7, 2025

Re: Request to Pause Adoption of the 2024 International Energy Conservation Code

Dear Commissioner Nunn,

On behalf of the Home Builders Association of Georgia, thank you for your ongoing efforts to ensure Georgia homes are safe and affordable. HBAG has worked in partnership with DCA for years to the benefit of homeowners statewide. The State Codes Advisory Committee is a well-known standard-bearer for the practice of state government engaging with industry stakeholders to find common-sense solutions.

We respectfully ask that DCA **pause adoption** of the 2024 International Energy Conservation Code (IECC) and continue under the 2015 IECC with Georgia amendments. The data shows that moving to the 2024 IECC would create significant upfront costs for homeowners, with limited financial payback—ranging from 5.7 years for all-electric homes in Climate Zone 2 to more than 22 years for mixed-fuel homes in Climate Zone 3, meaning families would face thousands (**up to \$10,189**) in extra construction costs for minimal annual savings (**up to \$451**).

Georgia is in the midst of a housing affordability crisis, with working families across the state struggling to achieve homeownership. Burdening new homes with thousands of dollars in mandated expenses puts the dream of homeownership out of reach. The data shows that every \$1,000 increase in the cost of a new home prices more than **5,000 Georgia households** out of the market. In the last five years, Metro Atlanta has seen the median price of a new construction home **increase from \$341,373 to \$469,900**.

Georgia's current energy code already positions the state well. Our 2015 IECC with amendments and 5 ACH blower door target aligns with or exceeds regional peers, including Florida, Tennessee, North Carolina, Alabama, and South Carolina. Even competitor states like Texas, Indiana, and Ohio remain on earlier editions, and nationally, only a handful of states have adopted the 2021 IECC, with Rhode Island being the *only state* on the 2024 IECC. California recently enacted a "building code freeze", pausing updates to residential building codes out to June 1, 2031.

Maintaining the 2015 IECC with amendments allows Georgia to protect affordability, support workforce housing and remain competitive, while still promoting energy-conscious practices. We would welcome the opportunity to work with your team on education, compliance, and targeted, cost-effective improvements that benefit both homeowners and builder -- without exacerbating the affordability challenges already facing Georgia families.

Thank you for your thoughtful consideration and your continued dedication to balanced housing policy in Georgia.

Warm regards,

Gabe Chatham
President

Austin Hackney
Executive Vice President