



March 3, 2025

Speaker Jon Patterson

Missouri House of Representatives

Jefferson City, MO 65101

Re: Oppose HB 939

Dear Speaker Patterson:

We are writing, representing various businesses and organizations within Missouri, regarding our concerns to HB 939. The bill would significantly weaken energy codes for residential dwellings in local jurisdictions that have adopted a more current version of the International Energy Conservation Code (IECC). Specifically, it would prohibit any Missouri community from enacting an energy code at or beyond the 2009 IECC. These restrictions take away a community's local control and would put residential energy codes nearly two decades out of date.

The proposed legislation also fails to recognize that some municipalities in Missouri have already adopted modern energy codes. By imposing blanket restrictions or rollbacks, this bill would create regulatory uncertainty, forcing communities that have invested in energy-efficient building practices to either abandon their progress or face compliance conflicts. Cities like Kansas City have proactively adopted updated energy codes, and a statewide limitation would undermine local decision-making, increase long-term energy costs for homeowners, and disrupt local economies that have adapted to modern building practices.

Ultimately, Missouri citizens face the biggest burden when outdated codes are used creating inefficient homes that cost far more to make them comfortable, even with added heating and air conditioning. **In Missouri's case, a Department of Energy analysis shows that the cost of constructing a home in Missouri to the 2021 IECC would raise the annual mortgage payment of a homeowner by \$54. In return, the average new homeowner in Missouri can expect to save 26.0% which equates to \$677 annually on their utility bills.¹**

This bill would also directly harm many Missouri manufacturers and employers. Companies that produce high quality insulation and air sealing products, such as Dupont in Pevely, DAP Foam in Pacific, FSI in Earth City, Carlisle in Sikeston, and others who produce insulation and air sealing products. These employers would see their product used elsewhere outside of the State as there would now be a limited market to use those products in the State where they are produced.

Preventing the adoption of modern energy codes could jeopardize federal programs for first time homebuyers and low-income families. It would leave hundreds of millions of dollars on the table. For example, the Federal Housing Administration and U.S. Department of Agriculture mortgage program currently requires compliance with the 2021 IECC for new home purchases. This bill would jeopardize the ability for new and low-income purchasers to obtain new homes in Missouri.

Energy Efficiency = Energy Security

Energy efficiency is the lowest cost option for meeting energy demand. At a time when energy security is a national priority, modern energy codes serve as a tool to reduce demand, increase efficiency, and help ensure that homeowners benefit from a more resilient and affordable energy future. Missouri can position itself for long-term energy stability rather than backtracking on efficiency measures that lower energy costs and reduce our dependence on strained energy infrastructure.

Energy Efficiency is Cost Effective

Proponents of rolling back the energy code may incorrectly suggest that modern energy codes will drive up construction costs. A strong energy code with the flexibility of many equally strong compliance paths will unleash the power of competition without picking winners or losers. For homebuyers who must maintain the home and pay for its utility and operational costs, features that reduce maintenance and utility bills are critically important. Reduced energy bills quickly repay the cost of improving energy efficiency.

There is no guarantee that reducing construction costs by removing these energy efficiency measures will be passed on to the consumer. Home prices for both new and existing homes are influenced by a number of market and economic factors that are unrelated to the installation of energy-efficient products and practices. There is not a direct 1-for-1 connection between energy code requirements and home prices. However, there is a direct and positive impact on operational costs. Poorly insulated homes might reduce the initial cost of construction but do so at a significant expense to the buyer and subsequent homeowners.

¹ U.S. Department of Energy, "State Energy Codes: Missouri," July 2021, https://www.energycodes.gov/sites/default/files/2021-07/EED_1365_BROCH_StateEnergyCodes_states_MISSOURI.pdf

Model codes are a floor, not a ceiling, and are developed through an exhaustive public process and represent the collective wisdom of thousands of experts from various industries of where the minimum standards should be set, including homebuilders.

In summary, we respectfully oppose this legislation because it costs homeowners money, increases energy usage, harms Missouri manufacturers and employers, threatens some federally insured home mortgages, and negatively affects low-income households, among other issues. We thank the committee for its consideration of our comments and request the bill be tabled for further discussion to find an alternative resolution.

Sincerely,

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American Chemistry Council

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