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April 12, 2022

Lara Isch, Sustainability Manager  
Office of Environmental Quality  
City Hall, 4th Floor Ste 401  
414 E. 12th Street  
Kansas City, MO 64106

**RE: Midwest Energy Efficiency Alliance (MEEA) Comments on the Kansas City Climate Protection and Resiliency Plan Draft**

Dear Lara Isch,

The Midwest Energy Efficiency Alliance (MEEA) greatly appreciates this opportunity to comment on the Kansas City Climate Protection and Resiliency Plan draft. MEEA is a collaborative network, promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities. Our organization seeks an achievable pathway for all people and communities in the Midwest to receive the economic, environmental and societal benefits of energy efficiency and the larger clean energy economy.

***Building Energy Codes***

MEEA is encouraged to see building energy codes highlighted in this plan. Energy codes are one of the most cost-effective energy policies that can be implemented. Strong residential and commercial energy codes provide minimum standards that not only result in the construction of more energy efficient buildings, but also buildings that are more resilient, healthier and have lower operating costs. This saves owners and operators money on utility bills and reduces health care costs for occupants. The most cost-effective time to implement the energy efficiency features included in the energy code is during the initial construction of the building. While there are certainly small incremental costs associated with updating any building code, the energy code is the only code that reduces operating costs and improves owner cash flow. These benefits continue far beyond the payback period – they last for the lifetime of the building, which can be from 50 to 100+ years.

The Climate Protection and Resiliency Plan seeks to review building codes every 3 years with the goal of adopting the latest International Energy Conservation Code (IECC). Committing to the regular adoption of the latest model energy code, starting with the 2021 IECC, is a critical step to incrementally improving the efficiency of Kansas City. The Climate Protection Steering Committee also recommends that the plan lay out a way to provide incentives for heat pumps, induction stoves/cooktops and solar-ready construction if not already included in updated building codes. These additional provisions would be helpful in achieving the plan's goals and prove Kansas City's commitment to climate and resilience planning, when combined with strong energy-efficient codes. In 2019, homes and buildings in Kansas City made up almost two thirds of Greenhouse Gas (GHG) emissions. Regularly updating Kansas City's building energy codes



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without weakening amendments will help reduce energy use and emissions from the buildings sector to help Kansas City achieve the vision of carbon neutrality by 2040. The energy efficiency benefits of updated energy codes are essential in helping Kansas City reach this goal.

Kansas City may also want to consider establishing energy reduction targets for the city's energy codes that extend beyond the plan's 2025 scope. This would provide clear, long-term goals for builders and provide a path for a carbon-neutral and resilient Kansas City by 2040.

### ***Workforce Development***

MEEA is excited to see provisions regarding training for local builders on high efficiency building techniques. It is important that workforce development techniques are implemented alongside updated energy codes so Kansas City builders and others in the design and construction industry can fully comply with the policies. Designating funding to provide training and resources on the new policies and provisions to builders, code officials, building operators and other stakeholders is critical to ensuring that the new codes and policies are being met. A higher rate of compliance with these codes means greater benefits for Kansas City and all its residents.

Broadly, ramping up energy efficiency investments as decarbonization demands will require a robust clean energy workforce. These expanded opportunities must be accessible to underrepresented and under-resourced groups, particularly marginalized communities of color, to address the historic racism and economic inequities faced by these communities. MEEA commends the city for including this opportunity within the plan and recommends that the Kansas City work in conjunction with existing programs, agencies, institutions, community-based organizations and utilities to expand trainings and recruitment activities targeted to marginalized groups.

### ***Benchmarking and Building Performance Standards***

MEEA supports the benchmarking and building performance standards section of the Climate Protection and Resiliency Plan. Benchmarking policies are vital to reducing energy use and GHG emissions. By tracking reliable and consistent energy consumption data, these policies can enable better decision-making around building energy use and reduce GHG emissions that contribute to climate change. Including building performance standards in this program is an important piece as well, especially in addressing energy use in existing buildings.

The Climate Protection and Resiliency Plan would revise Kansas City's current benchmarking program by adding building performance standards. MEEA encourages the development of building performance standards through a transparent, stakeholder-driven process. A good example of this is the recently passed Building Energy Performance Standard in St. Louis, which was developed with significant input from local representatives from the building sector, affordable housing and the larger community. In addition, the plan seeks to improve benchmarking compliance and encourage higher benchmarking scores. Increasing compliance with the current benchmarking program is essential to truly see improvement in building energy use.



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### **Energy Efficiency and Assistance Programs**

The energy efficiency programs that Evergy offers, enabled through the Missouri Energy Efficiency Investment Act (MEEIA), as well as those delivered by Spire Gas, are critical to achieving the city's pathway to decarbonization. MEEIA programs support waste reduction in homes, multifamily buildings and commercial and industrial facilities. The city should focus efforts to coordinate with and support the implementation of these programs. Stakeholder groups like the Missouri Energy Efficiency Advisory Collaborative and Low-Income Work Group are examples of opportunities that inform and align the design and delivery of energy efficiency programs.

As the plan notes, high energy burden is a challenge that the Kansas City must address. According to American Housing Survey data, 25% of both African American and Latino households spend 16% and 12% of their monthly income on energy, respectively. Moreover, these households are more likely to have home health hazards that must be addressed prior to implementing energy efficiency measures, which requires coordination of contractor services and funding streams. The city should work towards organizing and streamlining participation in the available energy (including solar), housing and health programs. One opportunity is to work towards a one-stop-shop model for assistance services. Another would be to leverage publicly-available or utility data to prioritize certain communities and households for electric and gas energy efficiency investments. Going forward, the city should also develop metrics and targets in coordination with utilities and community partners to reduce energy burden.

Thank you for the opportunity to comment on the Kansas City Climate Protection and Resiliency Plan. MEEA understands that creating a climate plan is a challenging undertaking and we are encouraged to see a commitment to reducing energy use and increasing energy efficiency in Kansas City. Please reach out to our Senior Policy Associate, Samarth Medakkar ([smedakkar@mwalliance.org](mailto:smedakkar@mwalliance.org)) if you have any questions for us on these matters.

Sincerely,

Nicole Westfall, Building Policy Manager  
Midwest Energy Efficiency Alliance