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SAMANTHA D. HORN
DIRECTOR

DATE: 12/18/2025

TO: City of Portland, Permitting & Inspections Department
CC: Samantha Horn, Director of Maine Office of Community Affairs
CC: Maine Technical Building Codes and Standards Board

FROM: Greg Gilbert, State Building Official

SUBJECT: MUBEC MEMORANDUM: 25.01 -
Scope of the Maine Stretch Energy Code

Purpose: The Technical Building Codes and Standards Board (TBCSB), also known as the Maine Uniform Building and Energy Codes (MUBEC) Board, was requested to formalize a determination on the application of the Maine Stretch Energy Code as written in the Maine Office of Community Affairs (MOCA), Building Codes and Standards (BCS) Rules Chapter 7 (formerly MUBEC, Chapter 6), Appendix NA. This memo is to be considered an interpretation by the board as advisory guidance and at this time does not change the actual language of the MOCA BCS Rule Chapter 7.

Background:

The Maine Energy Stretch Code is an optional appendix to the Energy Code chapter of the Maine Uniform Building and Energy Code. It includes more stringent energy efficiency requirements based on rules created by the Technical Building Codes and Standards Board and is intended to guide communities that want to exceed the State's baseline energy code and decrease energy consumption. The Energy Stretch Code is currently enforced by 2 municipalities, Portland and South Portland.

Regarding the residential provisions of the Energy Code, Appendix NA – MUBEC Stretch Code states:

“Residential Projects: The Total Building UA for the project, calculated as outlined in R402.1.5, shall exceed the UA requirements by at least 15% over a code compliant project. *This means that the Envelope PASSES design by 15% better (or more) than code per the RESCheck compliance calculation.* For residential projects that do not include fossil fuels for any use (heating, cooling, hot water, backup heat, cooking, etc.) the Total Building UA shall exceed the UA requirements by at least 10% over the base code compliant project. This electrification incentive allows the use of fossil fuels for backup power generation.”

Code officers from the City of Portland brought the following concern to the attention of the TBCSB when applying the stretch code:



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“Our office has run into real issues with enforcement of the 15% of both additions and alterations. I can provide examples if it helps, but the gist is that a non-insulated house where a dormer is being added, like a cape built in 1890, once the existing exterior walls and the new dormer walls and roof are entered into REScheck, there is no amount of insulation that will get the project to passing, let alone 15% better - and this is not accounting for the MUBEC changes.”

“As we were asked to keep the language close to the original, I'm assuming that REScheck will have to stick around in order to determine compliance. For simplicity's sake I recommend that we insert the word "new" when referring to projects so that the stretch code is only applicable to new projects. Otherwise, it's really going to be a challenge to not change the language and to have something that's actually verifiable and enforceable.”

Summary:

Based on the stretch code requirement to use REScheck for residential projects, applicants were having difficulty achieving the requirements of the Maine Energy Stretch Code for smaller additions or providing enough information for the software to properly review. The City of Portland requested clarification or modification in applying the stretch code to alterations and smaller additions.

A specific insulation value is not defined for construction alterations where wall cavities are opened, only that the cavity be filled with insulation (2021 IECC R503.1.1). Without requiring a specific insulation value, there is no way to increase its value by a percentage. In prior discussion, the Board noted that REScheck does not provide reliable compliance information for small area additions. Since compliance with the stretch code is based on REScheck approval, it is most practical to limit the stretch code to building envelope components that have clearly defined insulation values, and that REScheck can accurately calculate.

The TBCSB convened the Energy Technical Advisory Group (TAG) to review this issue and propose a resolution. The Energy TAG determined that this issue was valid. The recommendation by the TAG was to confirm that the Stretch Code applies only to new construction.

Conclusion:

On June 26, 2025, the Technical Building Codes and Standards Board determined, with a vote of 8 to 0 in favor, that the Stretch code appendix applies only to new construction and new additions of habitable space. Furthermore, on August 21, 2025, the TBCSB voted to include an additional modification to exempt residential dormers under 100 square feet from the Stretch Code Appendix. Alterations of existing buildings, as defined in the 2021



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IECC, are therefore exempt from complying with the stretch code and shall continue to meet the requirements of the IECC, chapter 5: *Existing Buildings* in both the commercial and residential provisions, respectively.

References

- **08-003 C.M.R. Chapter 7** – Maine Uniform Building and Energy Code: Energy Code – Appendix NA
- 2021 ICC International Energy Conservation Code

A handwritten signature in black ink, appearing to read 'Greg Gilbert'.

Greg Gilbert,
State Building Official
Maine Office of Community Affairs