



Setting the **Standards** for
Home Energy Efficiency

Interpretation: Including an open loft level as level or floor when determining the number of stories in a structure

Designation: IR 380-2019-012 & IR 380-2022-007 & IR 380-2025-005

Approved: June 23, 2026, by RESNET® SDC 300

Effective Date: July 23, 2026

Request from:

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Reference:

This request for interpretation refers to the requirements in:

Standard:	[ANSI/RESNET/ICC 380-2019] ANSI/RESNET/ICC 380-2022 [ANSI/RESNET/ICC 380-2025]
Section(s):	4.5.2; Definitions
Table(s):	Equation 4.5-5
Relating to:	S – number of stories above grade; definition of Residential Building

Excerpt of text: See excerpts of the referenced sections at the end of this interpretation. Note that the text is the same in the three editions.

Background:

HERS Raters, Modelers, and RFIs are tasked with determining the number of conditioned stories or floors or levels in a rated unit. This information is used in several places. It is used to determine whether or not a building qualifies as a Residential Building, it is part of the calculation to determine the amount of Service Hot Water use, it is used in the Index Adjustment Factor, and it is used in conjunction with the results of dwelling unit enclosure testing for conversion to units used by programs to gauge compliance. However, these terms, “stories”, “floors”, and “levels”, are not fully defined and it is unclear how to treat structures that have open loft levels. Some loft levels contain perhaps a small loft for use as an office or play area type of space, some loft levels may contain a bathroom or other area with plumbing. Should open loft levels be treated as an additional level in the structure?

Interpretation: *Proposed by the Petitioner.*

An open loft level of a structure that has an average ceiling height of seven feet or more for the loft area intended for human occupancy should be counted as a story for the purpose of calculating NLA. Other open loft areas would not be counted as a story.

Question: Is this Interpretation correct?

SDC Answer: Yes



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Excerpts of text:

All three editions of Standard 380 have the same definitions.

Calculation to determine Normalized Leakage Area:

NLA = SLA x (S)0.4, where **S is the number of stories above grade** (Equation 4.5-5)

Definition of a Residential Building:

Residential Building – Includes detached one-family Dwellings and two-family Dwellings and multiple single-family Dwellings (Townhouses) and Group R-2, R-3 and R-4 buildings **three stories or less in height above grade plane.**

SDC Comments: The number of stories (S) used in Standard 301 and 380 has a basis in many residential building code structures where the number of stories above grade is a determinant of residential building type. As such, S in Standard 380 refers to only the number of stories above grade, and as described by the proposed interpretation, may include some open lofts.

The IBC definition of story: *That portion of a building included between the upper surface of a floor and the upper surface of the floor or roof next above.*

It should be noted that an Erratum is needed to correct this NLA equation in Standard 380-2019, 380-2022, and 380-2025 which should have shown 0.4 as an exponent, rather than as a product.

$$NLA = SLA \times (S)^{0.4}$$

A HERS Addendum will be proposed to further edit this equation to align with the Normalized Leakage (NL) equation in Appendix C of Standard 301-2025.

It should also be noted that where an authority having jurisdiction requires the use of NLA for assessing air leakage, the current NLA equation in Standard 380 yields very different results than the NL equation in Appendix C.