



February 5, 2024

International Energy Conservation Code
ICC Appeals Board

Submitted via electronic commenting system

Re: CalETC's Opposition to Appeals 23-01 through 23-09

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Board of the International Code Council's consideration of appeals 23-01 through 23-09.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC opposes appeals 23-01 through 23-09, which seek to overturn measures including electric readiness, EV charging readiness, efficient and resilient code requirements, stretch code appendices, and all-electric appendices. Building codes that include electric vehicle readiness are not only key to enabling the transition to electric vehicles, which all major auto makers have signaled they are making, but it is also critical to avoiding costly retrofits and electrical upgrades when charging needs to be installed in the future. We strongly urge you to reject these appeals.

Thank you for your consideration of our comments. Please do not hesitate to contact me kristian@caletc.com should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Corby", with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition