

Opposition to 23-01 to 23-09

Dear Board of the International Code Council (ICC) and Appeals Board,

Drive Electric Dayton opposes any attempt to remove/overturn electric readiness, EV charging readiness, efficient and resilient code requirements, stretch code appendices, and all-electric appendices. These appeals have no merit: they are trying to relegate substantive, consensus decisions made according to all applicable policies and procedures as laid out in the ICC Code Development Principles. We urge you to reject appeals 23-01 through 23-09, which seek to overturn these measures.

Measures being appealed include electric readiness, EV charging readiness, efficient and resilient code requirements, stretch code appendices, and all-electric appendices. These appeals have no merit: they are trying to relegate substantive, consensus decisions made by the book according to all applicable policies and procedures.

EVs are coming. New buildings must be ready to charge the surge of new electric vehicles being sold over the coming decade.

EVs save energy. Electric vehicles are [far more efficient than gas cars](#); and they have [fewer lifecycle emissions](#), even when powered by coal-fired electricity. When addressing the question of equity and racial discrimination, EV adoption and proposals to aid in the deployment of EVs and its infrastructure in underserved communities saves money for its citizens. A citizen can save a minimum of \$1,000/year in fuel costs. This additional savings can be used for food, in food desserts, books and clothing to enhance education. EV's and its infrastructure aids in the reduction of asthma and many other health issues caused by gas emissions.

Efficiency saves lives. Watering down efficiency requirements in new buildings is unacceptable. National labs and the Department of Energy have found that more efficient, [better insulated and sealed buildings save lives](#) during extreme heat and cold. As these dangerous events increase, we have to plan to protect residents and workers.

Gas system lock-in will most hurt the most vulnerable: Without electric-ready wiring and panels that make swapping to electric appliances easy and affordable, low-income building occupants risk becoming trapped in a gas system that gets [more and more expensive as more of its customers leave](#). We can't plan to leave vulnerable people with a \$150 billion, unpayable gas bill.

Residential. It is important in the residential sphere that we have fair and equitable policies as it relates to new residential and multifamily units. 80% of EV owners charge at home, saving substantial amounts and protecting the grid.

It is essential that we have a national policy that states can adhere to across the board. It is substantially cheaper to place wiring in new homes and multifamily builds.

It is unethical and discriminatory not to include EV infrastructure in new homes and multifamily units in underserved communities. Based on the history of racism and redlining, citizens in underserved communities have been placed at a substantial disadvantage when competing with citizens who have these amenities. Adding EV infrastructure and equitable policies will create jobs, have significant health benefits and build a sense of pride in its residents.

The final draft codes were reached through rigorous, lengthy, expert-driven, by-the-book consensus processes. There is no valid process or procedural issue to appeal on. The appeals should not even be entertained.

Drive Electric Dayton employs the Board to oppose any changes to appeals 23-01 through 23-09 and help oppose any efforts to make EV adoption being the next redlining arena faced by those in underserved communities.