



February 5, 2024

Dominic Sims  
Chief Executive Officer  
International Code Council  
200 Massachusetts Ave NW  
Washington, DC 20001

Dear Mr. Sims:

On behalf of the Electric Vehicle Charging for All Coalition (EVCAC), **we are writing in strong opposition to all appeals of the 2024 IECC – 23-01 through 23-09 – currently under consideration by the Appeals Board.** We would also like to express our support of [the letter submitted to you earlier today](#) by our colleagues at ACEEE, and our dismay at **serious irregularities we have observed in the appeals process.**

[EVCAC](#) is a non-profit that works with many for-profit and non-profit organizations throughout the US to advocate for EV Ready building codes. Our two guiding principles are to maximize equitable, affordable access to “EV Ready” (plug-and-play) charging at home and at work; and to minimize the cost and complexity of EV charging for residents, builders and property managers.

Beginning in early 2023, EVCAC participated as an interested party in the ICC’s Consensus Committee process for both the Residential and Commercial 2024 IECC. Our involvement included submitting multiple proposals for consideration and participating in all discussions pertaining to Electric Vehicle transfer provisions. While our proposals were not accepted, we can attest to the fact that the provisions approved in the 2024 code-making process were made through a clear, consensus-based process.

**Including these EV provisions in the main body of the code represents a critically important step forward for US energy efficiency.** Electric vehicles are [far more efficient than gas cars](#) and have [fewer life cycle emissions](#). Unlike gas cars, which must be fueled at commercial service stations, the vast majority of EV charging happens at home, where cars are parked for many hours overnight. The next most common location for EV charging is at work, where cars are often parked for many hours during the day. Taking advantage of this long ‘dwell time’ enables low-cost, lower-powered charging – which is more efficient, easier on the grid, easier on electric vehicle batteries, and substantially less expensive to install and operate than DC fast charging.

**The need for this charging infrastructure is growing at an exponential rate:** EV adoption rates in all parts of the US are doubling every two years, with [many automakers targeting all-electric lineups by 2030 or earlier](#). Proposed EPA rules are projected to cause two-thirds of light duty



vehicle sales to be all-electric by 2032.<sup>1</sup> New and renovated buildings must be ready to charge the surge of new electric vehicles that are coming.

**The most cost-effective time to install this critical infrastructure is at the time of new construction.** Studies estimate it is 3-12x less expensive to make buildings EV-ready at initial construction instead of retrofitting.<sup>234567</sup> From a purely cost-savings perspective, it is critical that EV power transfer provisions remain within the main body of the 2024 IECC.

**EVs are part of a broader effort to electrify and improve the efficiency of our buildings to address the climate crisis.** We recognize that the industries with a clear vested interest in the status quo are targeting their appeals not only at EV infrastructure but also at measures addressing electric readiness, efficiency and resilience, and at appendices containing stretch codes and all-electric provisions. We stand in strong support for ALL of these critical provisions in the 2024 IECC, as they are essential to future proofing America's building stock and transportation systems, and reducing our reliance on fossil fuels.

We were surprised at the ICC's last-minute decision to extend the appeals deadline, and we are concerned about this and other irregularities in the published appeals process. The process published with the appeals announcement originally indicated these appeals would be heard first by the Consensus Committees – giving us time to craft our response and share this news with other interested parties. We were alarmed when that process was suddenly abbreviated last month for all but one of the appeals (the only appeal which did not affect the EV provisions) – effectively shortening the time we had to prepare by a full month.

**We therefore request that you reject appeals 23-01 through 23-09, and that you maintain the 2024 Commercial and Residential IECC as written and approved, consistent with the established ICC code adoption process.**

Respectfully submitted,

Vanessa Warheit, National Lead  
EV Charging for All Coalition

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<https://www.google.com/url?q=https://www.epa.gov/newsreleases/biden-harris-administration-proposes-st-longest-ever-pollution-standards-cars-and&sa=D&source=docs&ust=1707174691933513&usg=AOvVaw1P9QXeCUS-FNEoWkAXNweT>

<sup>2</sup> <https://docs.google.com/presentation/d/1a9SpKtCecMbCXUa3H7H10jBa2V2r1vme/edit#slide=id.p1>

<sup>3</sup> [https://www.pge.com/pge\\_global/common/pdfs/solar-and-vehicles/your-options/clean-vehicles/charging-solutions/program-participants/EV-Charge-Network-2020-Q2-Report.pdf](https://www.pge.com/pge_global/common/pdfs/solar-and-vehicles/your-options/clean-vehicles/charging-solutions/program-participants/EV-Charge-Network-2020-Q2-Report.pdf)

<sup>4</sup> [https://bayareareachcodes.org/wp-content/uploads/2020/03/PCE\\_SCVE-EV-Infrastructure-Report-2019\\_11.05.pdf](https://bayareareachcodes.org/wp-content/uploads/2020/03/PCE_SCVE-EV-Infrastructure-Report-2019_11.05.pdf)

<sup>5</sup> [https://ww2.arb.ca.gov/sites/default/files/2020-08/CARB\\_Technical\\_Analysis\\_EV\\_Charging\\_Nonresidental\\_CALGreen\\_2019\\_2020\\_Intervening\\_Code.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-08/CARB_Technical_Analysis_EV_Charging_Nonresidental_CALGreen_2019_2020_Intervening_Code.pdf)

<sup>6</sup> [https://docs.google.com/document/d/1vtGgAlbJdEA5UfOgb\\_KD4ExYcyO6TfWEedhP59JrM5I/edit](https://docs.google.com/document/d/1vtGgAlbJdEA5UfOgb_KD4ExYcyO6TfWEedhP59JrM5I/edit)

<sup>7</sup> <https://energyoffice.colorado.gov/sites/energyoffice/files/documents/FINAL%202022-CEO-CO%20EV%20Equity%20Study-2022-08-06.pdf>