

February 5, 2024  
International Code Council  
Appeals Board

Re: International Energy Conservation Code 2024 Appeals

Members of the ICC Appeals Board,

The Electric Drive Transportation Association appreciates the opportunity to comment on the 2024 version of the International Energy Conservation Code (Residential and Commercial) and the appeals filed with the International Code Council (ICC) regarding it.

The Electric Drive Transportation Association (EDTA) is the collective voice of the entire electric transportation value chain. Building the electric transportation ecosystem will create efficiencies in infrastructure, as well as vehicles. EV-ready buildings and homes will provide micro- and macro-level energy, economic and environmental benefits.

The future of transportation is electric. Over 4.7 million plug-in vehicles are on the road today. The current market of over 100 EV models will expand by fifty new models in the next three years. From 2022 to 2023, plug-in electric vehicle sales grew by 51%, representing a 34% increase in market share. According to a report from BloombergNEF, over half of passenger cars sold in the U.S. will be electric vehicles by 2030.

The built environment needs to reflect and anticipate this transition. Equitably serving a national fleet of electric drive vehicles will require adding infrastructure that supports commuter, commercial, regional and interstate driving needs. Building codes that incorporate these market imperatives can help to ensure that EV infrastructure is integrated into energy planning as an asset. Integrating EV infrastructure into building codes will reduce retrofit costs, allow for efficient management of energy, and ensure that residential and commercial buildings are able to efficiently meet the needs of an exponentially expanding number of occupants requiring access to charging infrastructure.

EDTA strongly supports the revised 2024 version of the IECC, as well as the process through which it was developed.

The ICC governing rules provide that the appeals board “shall only consider matters of process and procedure and to sustain an appeal must determine there was a material and significant irregularity in the process or procedures.”<sup>1</sup> The record, and participating EDTA members, document a regular and appropriate process with no material or significant irregularity.

Further, we contend that other challenges to the 2024 Code are technical in nature, rather than matters of process and procedure, and hence are outside the purview of the appeals board.

## EV Charging Infrastructure

The new requirements for electric vehicle (EV) charging infrastructure included in the 2024 Residential and Commercial IECC are the result of a regular process, including open and robust consideration of language, alternatives and amendments from multiple stakeholders in the Residential and Commercial Energy Code subcommittees and full committees.

The committees fully vetted relevant technical and other questions, including scope and intent, consistency, feasibility and policy, throughout a fair and open process that provided all parties have ample opportunity for comment and participation. The ensuing committee votes regarding EV charging provisions met the subcommittee and full committee requirements for consensus.

As there were no process or procedural issues with the language or the voting, the Appeals Board should reject the appeals and affirm the inclusion of EV charging infrastructure in the body of the 2024 IECC.

Thank you for your consideration.

Respectfully Submitted,

Genevieve Cullen  
President

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ICC website: <https://www.iccsafe.org/products-and-services/i-codes/code-development/2024-iecc-appeals/>