



February 5, 2024

International Code Council  
500 New Jersey Avenue, N.W.  
6th Floor  
Washington, D.C. 20001

**Re: *Comment Letter Supporting the International Energy Conservation Code Appeals Filed by the American Public Gas Association***

ICC Appeals Board:

On January 2, 2023, the American Public Gas Association (APGA) filed an appeal of several proposed provisions of the 2024 International Energy Conservation Code (IECC). We are writing to you today in support of these appeals.

Our organization supports the transparent development of building codes and standards, including the IECC, through consensus-based processes that follow the tenants of due process and fair competition. Unfortunately, we are concerned that a number of provisions were inappropriately processed for inclusion in the 2024 version of the code and thus must be removed.

As noted in APGA's appeal filing, a number of the proposed provisions fall squarely outside of the IECC's clear scope and intent provisions. Provisions that incorporate additional energy efficiency and greenhouse gas reductions belong squarely in the nonmandatory appendices, if in the code at all, as they neither guarantee increased energy efficiency nor emissions reductions, but do increase the cost of complying with the ever-increasingly complex code.

ICC codes are adopted at all levels of government, so it is important to ensure that ICC's robust development process for the IECC remains fair and transparent. We were disappointed to see that the development of the 2024 IECC did not always meet this high standard that ICC has traditionally held itself to. These violations in due process have resulted many provisions that would hinder the ability for Americans to choose the direct use of natural gas for their homes or businesses, making the code anticompetitive on its face.

The Gas Authority, officially known as the Municipal Gas Authority of Georgia, represents 83 municipally owned natural gas distribution systems across five states (68 in Georgia, 10 in Alabama, 3 in Florida, 1 in Pennsylvania, and 1 in Tennessee). These systems serve over 270,000 natural gas consumers in rural, lower to middle-income areas. Inappropriately adopted and ill-advised provisions could impose excessive burdens on both existing and future natural gas consumers.

104 TownPark Drive  
Kennesaw, GA 30144

770-590-1000 [www.gasauthority.com](http://www.gasauthority.com)

Mandating "EV" ready homes or setting unreasonable efficiency targets may compel typical municipal customers to make difficult choices between heating or cooking and meeting other life essential expenses. The Gas Authority actively collaborates with communities such as Sparta, Georgia, where the average annual family income falls below \$40,000. The residents in these areas heavily depend on natural gas as an affordable fuel for home heating and cooking. In Georgia, the escalating electricity rates pose an additional strain on consumers. The challenges and costs of converting existing homes or constructing new ones with an all-electric setup will make affordable housing unattainable for most of these consumers.

One crucial service provided by the Gas Authority to municipal systems is an aggregated risk management (hedging) program. This program is strategically designed to mitigate price risks and curb volatility in retail rates for consumers. Over time, these initiatives have consistently prevented major price spikes, keeping retail natural gas rates reasonable and well below those of electricity.

We are proud members of AGPG. APGA's public gas utility members, like ourselves, provide the energy needed by the homes and businesses that will ultimately be impacted by the IECC. As a critical stakeholder in this proceeding, we urge you to uphold APGA's appeals and remove the contested provisions from the final 2024 IECC.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Tolleson", is written over a light blue horizontal line.

Scott Tolleson  
Vice President, Member Support and Government Affairs  
Municipal Gas Authority of Georgia