



February 5, 2024

## Comments on AGA and APGA Appeals to the 2024 IECC and Renewable Energy Requirements

On behalf of the National Glass Association (NGA) and the Glazing Industry Code Committee (GICC), we wish to share our brief comments in opposition to the 2024 IECC appeals from the American Gas Association and the American Public Gas Association.

GICC and NGA are very active in the ICC code development process, including having a voting representative on the commercial IECC consensus committee. While there is always room for improvement, we believe the new IECC consensus committee process has been successful, and has allowed more in-depth discussion of technical issues and proposals with all interested parties in an open and transparent process. Overall, we are supportive of the 2024 IECC developed by the consensus committees, and strongly support the continued use of the consensus committee development process for future versions of the IECC.

As part of the development process, we are well versed in the electrification-related issues and proposals being raised in the various appeals. In general, we believe that electrification can and should be addressed through the IECC and other I-codes, as it directly relates to the effective use of energy in the built environment. However, we would like to focus our comments specifically on the topic of renewable energy requirements in the body of the energy code.


Both the AGA and NPGA appeals specifically cite CECPI-2 related to renewable energy requirements for commercial buildings, along with other issues it claims are out of scope of the IECC. **We would like to point out that renewable energy requirements have been in the main body of the commercial IECC since 2012 as part of C406, and are clearly already established as in-scope.** Over the last 14 years, the code development committees, voting body of code officials, and recent consensus committee have all supported that renewable energy requirements are within the scope of the main body of the IECC, and not just as non-mandatory appendices. More specifically, the cost effectiveness and technical feasibility of the renewable energy requirements have been well vetted for both the IECC and ASHRAE 90.1, and discussed with all interested parties through open code hearings and consensus committee processes.

While we believe the IECC can and should broadly address electrification-related issues, regardless of what is decided on other topics under consideration, we urge the Appeals Board

at a minimum to reject any appeals asking to remove or withhold the renewable energy requirements.

Thank you again for the opportunity to comment, and please contact me with any questions.

Best regards,

A handwritten signature in black ink, appearing to read "Thomas D. Culp". The signature is fluid and cursive, with the first name "Thomas" written in a larger, more prominent script than the last name "Culp".

Thomas D. Culp, Ph.D.

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on behalf of the National Glass Association and Glazing Industry Code Committee

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