



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

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. We are concerned that several provisions were incorrectly processed for inclusion in the 2024 version of the code and thus must be removed.

Also as noted in APGA's appeal filing, a few of the proposed provisions fall squarely outside of the IECC's clear scope and intent provisions.

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. The development of the 2024 IECC did not always meet this high standard that ICC has traditionally held itself to.

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 respectfully 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,

Philadelphia Gas Works