



Perry McGuire
VP & General Counsel
(770) 632-4326
pmcguire@rinnai.us

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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.

Rinnai America Corporation ("Rinnai") respectfully submits his letter in support of the appeals. Rinnai is the U. S. based subsidiary of Rinnai Corporation, Nagoya, Japan, and is part of the over 100-year-old Rinnai Group. Rinnai is the leading gas tankless ("instantaneous") water heater provider in North America.

Rinnai has its headquarters in Peachtree City, GA and in 2022, it opened the first gas tankless water heater manufacturing facility in the United States, a 360,000 square foot manufacturing facility in Griffin, Georgia.

We are proud members of APGA and AGA. 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 that reads "Perry McGuire". The signature is fluid and cursive, with a long horizontal stroke at the end.

Perry McGuire
Vice President and General Counsel