



March 17, 2026

The Honorable Audrey Robertson
Assistant Secretary of Energy (EERE)
Critical Minerals and Energy Innovation
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Assistant Secretary Robertson –

Thank you for your February 15, 2026, letter (“Subject: Development of the International Energy Conservation Code”) outlining the Department of Energy’s (DOE) priorities for the 2030 International Energy Conservation Code (IECC) and 2030 IECC Expanded (IECC-X). DOE is a valued partner in the development of the IECC, and your team’s active participation ensures that federal interests are accurately and clearly represented in a transparent, consensus-based, world-class code-development process. We welcome the opportunity to continue an open and constructive dialogue.

The proposed changes to the IECC will ensure that jurisdictions have access to high-quality, reliable model codes that enable them to meet their policy and regulatory objectives efficiently while supporting the industry with consistency. The objectives outlined in your correspondence, including DOE’s priorities and concerns about consumer costs and choice, align with the core principles that guided the development of the 2030 pathway, including the defined scope, intent, and associated economic criteria.

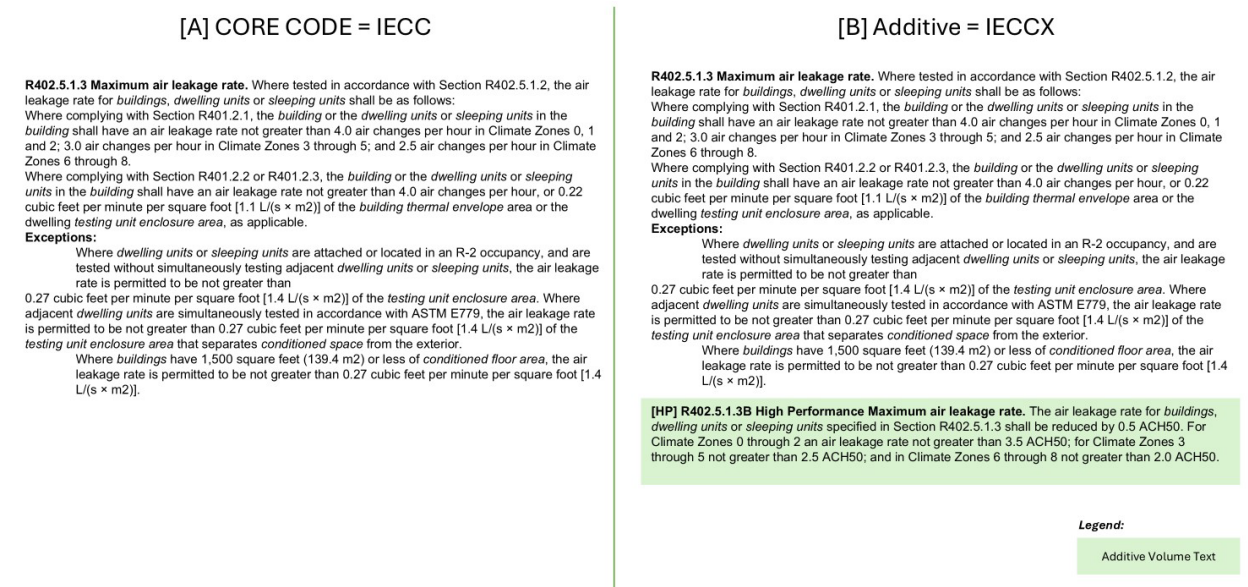
The International Code Council (ICC) develops codes, standards, and solutions that are widely used to promote safe and efficient buildings throughout the United States. Consistent with ICC’s mission, the IECC is designed to support energy conservation while maintaining affordability and flexibility for jurisdictions and stakeholders.

The ICC energy codes provide for the safe and efficient use of energy and are not intended to eliminate, favor, or discourage any particular fuel type. This principle is reflected in the ICC’s established development procedures for our codes and standards, which are designed to support safe, affordable, efficient, and cost-effective solutions regardless of energy source. The proposed approach to the **2030 IECC** and **IECCX** is structured to ensure that the codes do not preempt federal law. As demonstrated in the past, the ICC has procedures in place to effectively address federal preemption issues and ensure they are not included in the codes we produce

The updated approach to the energy code directly addresses the longstanding challenges posed by varied energy conservation practices across U.S. jurisdictions. The 2030 “additive” framework introduces a foundational set of energy conservation requirements (2030 IECC), with the option for

jurisdictions to layer on additional measures by adopting the provisions set forth in the 2030 IECC Expanded. This structure maintains consumer choice, an important priority for DOE, and upholds the principles of federalism by enabling jurisdictions to determine which safety codes and standards best meet their respective needs. This path forward will also provide manufacturers and designers with some assurance that, when jurisdictions decide to go beyond provisions in the base code, such approaches have been vetted through a consensus process and represent a consistent approach. Please see Figure 1 below.

Figure 1 Graphic Example of the Additive Approach



The **2030 IECC** focuses on traditional measures of energy conservation (e.g. BTUs and therms) and relies on average building occupancy assumptions supported by available and defensible industry data. The 2030 IECC does not include greenhouse gas (GHG) or carbon-based requirements, metrics, cost analyses, or optional credits. It is also intended that the statutorily required determination by DOE upon release of an updated energy code be conducted on the 2030 IECC as compared to the 2027 IECC. This approach ensures alignment with DOE’s stated objectives and preserves the IECC’s role as the federal benchmark for residential energy efficiency, distinct from programs that emphasize carbon-based measures.

The **2030 IECCX** builds upon the unedited 2030 IECC baseline, providing jurisdictions that want to include additional requirements or options with a consistent, consensus-based approach. These provisions are intended to address the full life cycle of the building, support enhanced energy-saving targets required by jurisdictions, expand opportunities for integrated building design and operational strategies, and enable energy management approaches that may include emissions-based measures of efficiency or savings.

The inclusion of optional credits provides designers, builders, owners, and jurisdictions with flexibility in achieving overarching energy conservation goals through multiple pathways. This

approach recognizes that energy performance is often best achieved through the holistic integration of building systems rather than by relying on individual component efficiencies.

ICC shares DOE's commitment to data transparency in the code development process. Historically, cost-effectiveness analyses within the IECC were developed by individual committees, with requirements to clearly state anticipated energy savings, identify calculation methodologies, and document source data. For the 2030 energy codes, economic analysis requirements have been further refined. ICC engaged the Dodge Construction Network's Chief Economist to establish market-based standards for evaluating the economic impacts of proposed code changes within the energy codes.

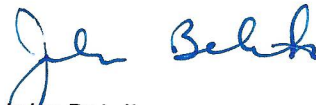
This work establishes a consistent framework for cost-benefit analysis (CBA) aligned with industry practice and the principles outlined in OMB Circular A-94. The framework incorporates component, maintenance, and energy costs with payback periods derived from industry-wide data. For example, the 12-year residential occupancy assumption reflects the average length of home ownership across the industry. ICC remains open to reviewing alternative, unbiased industry data that may support different assumptions.

ICC will provide additional definitions and illustrative examples in its updated Cost Estimation Guideline. As always, ICC remains available to discuss any specific aspects of the cost-benefit analysis that DOE may wish to review.

The ICC Board of Directors is currently reviewing submitted comments and will consider this feedback during deliberations at its April meeting in Hartford, Connecticut. Following that gathering, ICC would welcome the opportunity to meet with DOE to discuss the outcomes and any additional topics of interest.

Thank you again for your letter. We appreciate the opportunity to clarify these matters and firmly believe that continued, open dialogue between DOE and ICC is essential to ensure decisions are informed by accurate, fact-based information as we collectively navigate the complex energy conservation landscape.

Very Respectfully,

A handwritten signature in blue ink that reads "John Belcik". The signature is fluid and cursive, with the first name "John" and last name "Belcik" clearly legible.

John Belcik
Chief Executive Officer