

# Colorado Chapter, Inc. of the International Code Council Promoting Building Safety for 68 years

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International Code Council  
500 New Jersey Avenue, NW  
6<sup>th</sup> Floor, Washington, DC 20001

Dear Board of Directors:

The Chapters' code development committee is writing to express concerns about removing energy code requirements from the governmental consensus process. The following is for your consideration.

- **Code adoption:** The IECC would join the NEC as a primary code developed outside of the ICC governmental consensus process. The change to process could be used to open the door for competing codes, energy and otherwise, during the adoption process.
- **Coordination:** Removing the IECC from the governmental consensus process also removes it from the oversight of the ICC Code Correlation Committee. Energy provisions overlap in to other I-codes and coordination is imperative.
- **Diminishes value of code officials:** Reducing governmental members vote down to only those on a committee diminishes our effect in the development of the codes we are charged to obtain compliance with.
- **Educational benefits of the governmental consensus process:** Commentaries explain why something is in the code, however exposure to the code debate provides an understanding of why a provision perhaps might not always apply, even though it was ultimately voted in. This knowledge creates a better understanding of the code and improves our ability to educate customers, all the while building judgement - and the next generation of code officials.
- **Keep seeking solutions:** We applaud the ICC for continually looking for ways to do things better. Regardless of the outcome, the Colorado Chapter will continue to be strong supporters of the International Codes.

Thank you for the opportunity to provide comments on considerations for updating the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC) using the standards process.

Respectfully submitted,

Shaunna Mozingo  
Code Development Committee Co-Chair

*The Colorado Chapter of the International Code Council is dedicated to the improvement of building safety, by promoting and improving the International Codes, educating the building industry, public and our membership, and providing mutual aid to building professionals.*