



STATE OF RHODE ISLAND

**OFFICE OF  
ENERGY RESOURCES**

January 11, 2021

International Code Council (ICC) Board of Directors  
Attn.: Greg Wheeler, President  
500 New Jersey Avenue, NW  
6th Floor, Washington, DC 20001

RE: Proposal to Change the IECC and Chapter 11 of the IRC from a Code to a Standard

Dear President Wheeler:

I am writing in opposition to proposed changes that would shift the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC) from a code to a standard. By removing the current governmental consensus voting process, this proposed change would limit governmental member voices and could result in model codes that no longer represent the policies and objectives of states and local jurisdictions.

Rhode Island has robust climate and energy efficiency policies that require pursuit of least-cost energy resources (e.g., cost-effective energy efficiency, demand response, etc.) and reduction of economy-wide greenhouse gas emissions. These objectives can only be met by establishing robust new construction building codes that require best practices in green building construction. Given that our state has, traditionally, relied on the IECC as a basis for our statewide energy code, we believe it is critical that the ICC code adoption process continue to empower all stakeholders – especially state governments and other public sector members that adopt and enforce codes – to provide expertise and input.

I urge you to reject the proposed framework and maintain the governmental consensus voting process in future code adoption cycles.

Thank you for your consideration.

Sincerely,

Nicholas S. Ucci  
Commissioner