



DIVISIONS  
ENERGY  
GAS AND OIL  
GEOLOGY AND MINERAL RESOURCES  
MINED LAND RECLAMATION  
MINERAL MINING  
MINES  
ADMINISTRATION

# COMMONWEALTH OF VIRGINIA

## *Department of Mines, Minerals and Energy*

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August 26, 2020

Mike Pfeiffer, PE  
Senior Vice President of Technical Services  
International Code Council (ICC)

Dear Mr. Pfeiffer:

The Division of Energy within Virginia's Department of Mines, Minerals and Energy (DMME) is the Federally-recognized State Energy Office in the Commonwealth. DMME is committed to supporting successful and continuous improvement of International Energy Conservation Code (IECC), as this aligns with our mission to support programs and policies that further the energy efficiency, durability and safety of buildings for Virginians.

As you know, State Energy Office staff have long been full and respected participants in the IECC development process, including the Committee Action Hearings. For the 2021 IECC development process, DMME staff participated as Governmental Member Voting Representatives. DMME saw this opportunity as important precedent following the ICC's decision to open the process to a larger group of key stakeholders via online voting. DMME's staff is abundantly qualified to consider and vote upon changes to the IECC. DMME has and operated (and partnered with other organizations to develop) programs for many years that incent buildings to achieve above-energy code performance, and has had staff involved with the energy code development process at the state level--coordinated by DMME's sister agency the Virginia Department of Housing and Community Development (DHCD).

Advancing energy codes is a fundamental component of the Commonwealth's Energy Policy (§67-102 (A) (9)), which establish greenhouse gas emissions reduction standards across all sectors of Virginia's economy targeting net-zero emissions carbon by 2045.

Accordingly, DMME strongly opposes attempts to limit or roll back participation by governmental entities in the ICC's code development processes. The process must be open, inclusive and fair, and continue to afford participation by state and local government staff.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Warren".

John Warren  
Director