



GOVERNOR'S OFFICE OF ENERGY

January 6, 2021

International Code Council
Board of Directors
500 New Jersey Avenue, NW, 6th Floor
Washington, DC 20001

RE: International Energy Conservation Code (IECC) update to standards process

Dear ICC Board Members:

On behalf of the Nevada Governor's Office of Energy (GOE), we wish to express our concern that the International Code Council (ICC) Board is proposing to change the framework in which the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC) are developed. This proposal would eliminate public officials' ability to vote directly on changes to the IECC and Chapter 11 of the IRC, disenfranchising the critical voices of governmental members for whom the code is developed. Removing the governmental voting process will narrow this robust input of diverse governmental stakeholders and potentially yield unbalanced results in the development of the IECC. We encourage the ICC Board to reject the proposed framework and maintain the governmental consensus voting process in future code adoption cycles.

GOE participated in the 2021 IECC code development process as a Governmental Member actively engaged in the administration, formulation, implementation or enforcement of laws, ordinances, rules or regulations relating to the public health, safety and welfare. Like many state energy offices, GOE is responsible for the adoption and implementation of the IECC's most recent version. GOE's participation in the governmental consensus process included analysis of the proposed code changes, an assessment of how those proposed changes would further both GOE's work and Nevada's policy goals relating to public health, safety and welfare, and determinations on which code changes our office would support.

This work was not taken lightly. Our state and local energy codes rely on the IECC as a basis for building codes. GOE, along with many of Nevada's local governments, is committed to reducing GHG emissions within the built environment and the IECC is a crucial part in achieving those goals. As Nevada moves forward in state climate goals, energy efficiency goals and work to increase cost savings and comfort for its residents, being able to provide our voice in the development of the 2024 and future versions of the IECC ensures balance and a transparent process.

As such, it is critical that the code adoption process continue to empower stakeholders – especially governmental members – to provide their expertise and input in this discussion.

Thank you for the opportunity to offer our comments and share our concerns in your proceedings. We are hopeful that the ICC's thorough code development process will continue to directly incorporate the feedback, expertise, and input of the governmental members who base their own codes on the product of this process. We urge you to reject the proposed framework and maintain the governmental consensus voting process in future code adoption cycles.

Sincerely,

A handwritten signature in black ink, appearing to read "David Bobzien". The signature is fluid and cursive, with the first name "David" and last name "Bobzien" clearly distinguishable.

David Bobzien
Director