January 11, 2021

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

Re: Change in process for the Development of the International Energy Conservation Code

Dear Board of Directors:

Please accept this letter in response to the request for public comment regarding ICC’s interest and consideration in replacing the existing governmental consensus process for the development of the International Energy Conservation Code (IECC) with a new ICC appointed committee for the update of the commercial and residential energy provisions of the IECC, which includes Chapter 11 of the International Residential Code (IRC).

On January 11, 2021, during the MJC monthly meeting, the Steering Committee brought this item on the agenda to discuss the change in process and listened to testimony from all the jurisdictions represented by the Steering Committee. After the discussion, the Steering Committee made a motion and voted unanimously to present the Board of Directors with a recommendation to oppose this change and keep the current process of code development.

The Steering Committee represents the Major Jurisdictions in the Nation, and it is composed of representatives of the following cities:

- Austin, TX
- Oklahoma City, OK
- Seattle, WA
- New York City, NY
- Clark County, NV
- Denver, CO
- Chicago, IL
- Portland, OR

In general, we all share the same concerns, and the Board will receive individual letters explaining in detail those reasons. We realize the current process has its flaws, but we feel that the Board of Directors should make an effort to correct these flaws and improve the current strategy instead of changing the code’s development process.

Sincerely,

Jose G. Roig, CBO, CCEA
Chair of the Steering Committee for the MJC