



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Telephone: 617-626-7300
Facsimile: 617-727-0030

Charles D. Baker
Governor

Karyn E. Polito
Lt. Governor

**Kathleen A.
Theoharides**
Secretary

Patrick C. Woodcock
Commissioner

January 11, 2021

Dominic Sims
Chief Executive Officer
International Code Council
500 New Jersey Avenue NW
Sixth floor
Washington, DC 20001

Dear Mr. Sims,

On behalf of the Department of Energy Resources and in our role as joint implementers of the building energy code in the Commonwealth of Massachusetts, I write to express our concern with the recent proposal before the International Code Council (ICC) board to remove the governmental consensus process from the future development of the International Energy Conservation Code (IECC).

Our Department and our Commonwealth has long valued the work of the ICC to oversee and manage the ongoing development and timely publication of a broad swath of national model building codes including the IECC. Based on the open ANSI governmental consensus process that provides for both industry expertise and government membership participation and dialogue, the ICC has built up invaluable credibility as a transparent and independent code making body. The expertise and credibility ensured by the open and inclusive ICC governmental consensus process was the basis for our state legislature writing into law a requirement to adopt of the latest IECC as state energy policy in 2008.

Our agency has participated in every code adoption cycle since 2006, and adopted the resulting IECC in every code cycle since. Our engagement with the ICC governmental consensus process has grown over time in recognition of the growing importance of updated energy code for energy policy and public safety.

It is with this long-term commitment to the ICC in mind, that we are concerned to hear that the ICC's Blue Ribbon Committee on the Long-term code development process recently voted to recommend an abrupt and profound change to the code development process.

The elimination of the governmental membership vote appears to be hastily proposed and responsive to a comparatively small subset of stakeholders to one code cycle, that jeopardizes decades of work to develop the ICC's reputation as a transparent and open code-making body. We respectfully request that the board consider the long-term benefits of maintaining the close alignment between the code development process and the governmental members that adopt and implement the IECC energy code.

We wish to register our preference to preserve the current ICC development process that has served this nation well for many years, and that has led to the IECC becoming one of the most broadly respected codes in the world.

Thank you for your ongoing work and your time and attention to this matter.

Respectfully,

A handwritten signature in blue ink that reads "Patrick Woodcock". The signature is written in a cursive style with a large initial "P".

Patrick C. Woodcock
Commissioner

Cc: Greg Wheeler, President, International Code Council