

December 21, 2020

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

Dear ICC Board Members,

The National Association of State Energy Officials (NASEO) appreciates your December 9, 2020, response to some of our questions. As we expressed in our follow-up conversation with Dominic Sims on December 11, 2020, our state government members from across the political spectrum have significant concerns about the elimination of the International Energy Conservation Code (IECC), its replacement with a standard, and the resulting disenfranchisement of state government officials. Mr. Sims indicated that the conversion to a standard is intended to speed progress on state energy and environmental goals. However, the proposed approach gives every appearance of appeasing one industry segment, while squelching the full range of state government views. Exacerbating this situation is ICC's choice to offer a mere three weeks to comment on the proposal, during a period that includes holidays and is in the midst of a deadly pandemic where state government officials are scrambling to aid in saving lives and coordinate vaccine delivery. NASEO strongly encourages the ICC Board to take the following steps:

1. Extend the written public comment on the standard proposal to not less than 90 days – *after completion of items 2 and 3 below.*
2. Publish a description of the process for standard development, including:
  - a. Criteria and process for the selection of individuals to serve on the standard development committee, identification of the number of members and make-up of the committee, and the number of seats that will be granted to various industry and state government energy official representatives;
  - b. Specify the timeline for standard development, and affirm that energy efficiency rollbacks will not be permitted from the baseline of the 2021 IECC; and
  - c. Explain how the committee will accept comment on standard development changes.
3. Provide information on how ANSI will treat the creation of a second residential energy conservation standard (i.e., alongside ASHRAE's 90.2).

Taking the above steps would aid in restoring the states' view of ICC as an organization committed to transparency and best practices code development processes.

David Terry,



Executive Director, NASEO

CC: Dominic Simms, ICC CEO; Melike Oncu, ICC General Counsel;  
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