

Bruce J. Swiecicki, PE Senior Technical Advisor

August 11, 2020

Mr. Mike Pfeiffer ICC Staff Country Club Hills, IL

Re: Appeal of RE107-19

Hello Mike:

I hope you and your family are doing well during these trying times here in Tinley Park.

I am writing in support of the appeal submitted by the American Gas Association and the American Public Gas Association on their appeal of the action taken to approve proposal RE107-19 with Public Comment 1.

Proposal RE107-19 would effectively ban continuously burning pilot lights on gas appliances. The flaw in this proposal is that it purports to ban standing pilot lights in order to "save(s) energy." However, appliance energy efficiency requirements are under the sole purview of the U.S. Department of Energy through the enactment of the Energy Policy and Conservation Act of 1975. As a result, the adoption of RE107-19 would create a conflict with the federal regulations and that would violate the law.

Concluding, the National Propane Gas Association supports the appeal that would overturn the Final Action on RE107-98 and disapprove the code change. Thank you.

Sincerely,

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