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Sent: Thursday, January 7, 2021 7:38 AM
To: Member Input <memberinput@iccsafe.org>; Mike Pfeiffer <mpfeiffer@iccsafe.org>
Cc: Bill McHugh <bill@mc-hugh.us>
Subject: Energy Conservation Code Development Process

Dear ICC Committee – International Energy Conservation Code (IECC) Development Process.

As a longtime participant in the ICC's Code Development Process, I have felt that my voice gets heard by the code committees and also the assembly consensus. The current IECC (and ICC) Code development process seems to work well, in my opinion. Can it improve? Possibly....with more participation from Governmental Members.

I believe the move to a 'standard' is not necessarily the best thing for the ICC, the ICC Energy Conservation Code, nor the participants who help develop the code.

Below are my thoughts:

- 1. Switch to a 'Standards Development Process' for Energy Code...**
 - a. I vote against this standards development process....
 - b. The current process comments are below.

- 2. Current Process – This process, while it might be costly, is excellent.**
 - a. Allows input from non-code consultants – with a voice that is heard.
 - b. Provides venue for public input of non-code professionals.
 - c. Engages committees and a larger public audience than other standards development organization models.
 - d. However, the process needs to attract code officials / governmental voting members - at the hearings or at viewing remotely the same time as the hearings and voting real time, to have a true governmental consensus. They need to vote at the same time as the live vote, tallied as if they were there, to prevent appearance of misuse and mistakes.

- 3. Committee Process, committee meetings, like 'CAC's.**
 - a. Meetings seem to be so often, and so long, that if you are not a paid consultant, you are at a disadvantage as you have other things to do and cannot meet weekly for 6 months. "We decided that a few weeks ago", is what happens if you miss a few meetings.
 - b. Minority voices can't participate because they don't have time to meet a lot, and track when folks move topics from one committee to another to get a 'yes'.
 - c. Most standards development processes are not conducive for participation by minority voices, as it seems like voices form their own consensus without important input from opposing views.
 - d. Seems like a 'club' that creates the standards documents...and if you are not at the club all the time, your voice is discounted.

Please do consider not changing the process to a standards development process. It will squash participation by those who are not full time code consultants, and likely, code officials too.

Feel free to call if you have questions.

Bill

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