



January 11, 2021

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

Subject: International Energy Conservation Code (IECC) Development Process

Dear Board of Directors:

It is my understanding that the Board of Directors will be meeting later this month to consider changing the development process for the IECC (and Chapter 11 of the International Residential Code) to the ICC standards process (a.k.a. ICC Consensus Procedures) in lieu of the governmental consensus process currently used for this code and all other I-codes. On behalf of the City and County of Denver, I am writing to submit the following comments for your consideration.

1. The governmental consensus process involves diverse input from all interested parties with a preliminary review and vote by committee members from various interest groups, but the final determination of code provisions is by a vote of governmental members. The proposed standards process would instead put code provisions solely in the hands of a committee. As stated on ICC's website, "The governmental consensus process leaves final determination of code provisions in the hands of public safety officials who, with no vested financial interest, can legitimately represent the public interest". We strongly agree with this statement and feel that the final say on codes should remain in the hands of governmental members.
2. In addition to the final vote on code changes, governmental members can currently be very involved in the code change proposal and hearings process. This level of involvement would not be feasible with a standards process, so code changes would largely be driven by a small number of committee members.
3. We have a concern that changing the IECC to a standards process would open the door for other codes to follow, further removing the governmental members from the code development process.
4. With a move to a standards process, it is unclear if the IECC would fall under the oversight of the ICC Code Correlation Committee. The IECC provisions affect provisions in other codes and coordination between these codes is essential.

In summary, the City and County of Denver is opposed to moving IECC development to a standards process. We realize the current process has its flaws, but we feel effort is better spent to correct these flaws and improve the existing governmental consensus process. Thank you for the opportunity to provide comments on this proposed process change.

Sincerely,

Scott V. Prisco

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