



P.O. Box 52025
Phoenix, AZ 85072-2025

Greg Wheeler, CBO
President, International Code Council
City of Thornton
9500 Civic Center Drive
Thornton, CO 80229

Dominic Sims
CEO, International Code Council
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001

2019 Group B Appeals Board
c/o Mike Pfeiffer
Senior Vice President of Technical Services
International Code Council
500 New Jersey Avenue, NW
6th Floor
Washington, D.C. 20001

Re: Opposition to Appeal Filed regarding RE147 & CE217 Parts I & II – Scope and Intent

Gentlemen, and Members of the Board of Appeals:

The Appellant's request that these provisions not be included in the next edition of the IECC is based on the Appellants' contention that the proposals RE147 and CE217 Parts I and II are both outside the scope and intent of the IECC.

The IECC is the appropriate location for EV infrastructure requirements based upon the following points:

1. The IECC requirements layer on top of the IRC and IBC basic requirements; those jurisdictions with sustainability goals, including greenhouse gas reductions, can choose to adopt the IECC, leaving others the basic IRC and IBC.
2. It was through Federal legislation related to energy security that the development of Model Energy Codes was born; the impact of oil and gas costs for heating and automobiles became evident during the oil embargo. The IECC is a direct descendant of those early Model Energy Codes.
3. Extension cords are a source of fires. Residential occupancies need to be designed so that residential occupants can charge EV's without the use of extension cords. Multi-family residential properties in particular need available safe charging infrastructure.
4. The Membership voted to support these code changes. Whether they belong in the IECC or the IBC/IRC does not diminish the fact that the members believe that these code changes are needed.



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The IECC is a unique code within the I-Code Family, in that it often serves as an overlay code to the IRC and IBC for those more forward looking jurisdictions. As such, it layers upon the base codes additional clarity and direction. It is the appropriate “vehicle” for forward looking requirements for electrification and EV infrastructure. The next step in the EV code development will be to manage charging times, so that energy generation resources can be used in the most effective manner. These requirements belong in the IECC.

Through the National Energy Act of 1978, the Energy Independence and Security Act of 2007, and the American Recovery and Reinvestment act of 2009, the DOE has pursued codes and standards that transition energy use away from fossil fuels. The Energy Policy Act of 2005 included tax credits for building efficiencies, solar and Hybrid vehicle expenses. The improvement of building energy efficiency has been linked to reductions in fossil fuels, and the natural outcome is for EV infrastructure requirements to land in the IECC.

Electrical extension cords are the cause of more than 3,000 electrical fires each year, resulting in 50 deaths and 270 injuries.¹ Without proper infrastructure to allow for safe charging, residential occupants will utilize extension cords to charge their vehicles. The inclusion of these infrastructure requirements in the code will reduce this hazard at a time when EV ownership is increasing.

I urge you to leave in the code the items that the membership has voted to support. Should a jurisdiction choose to adopt the 2021 IECC, they alone should have the choice to remove an offending requirement.

Thank you for your time and efforts for the benefit of the ICC Membership,
Sincerely,

Sharon Bonesteel

Sharon A. Bonesteel, AiA, CBO

Energy Storage Collaboration Team Leader
Building Codes Program Manager
SRP | Product Development | PAB32W
P.O. Box 52025, Phoenix, AZ 85072-2025
M: (602) 814-7357

Salt River Project is a political subdivision of the State of Arizona which operates a federal reclamation project established by the Federal Reclamation Act of 1902.

¹ Source: Electric Safety Foundation International