



August 17, 2020

International Code Council  
2019 Group B Appeals Board  
500 New Jersey Avenue, NW  
6th Floor  
Washington, DC 20001

Re: RE126 Appeal

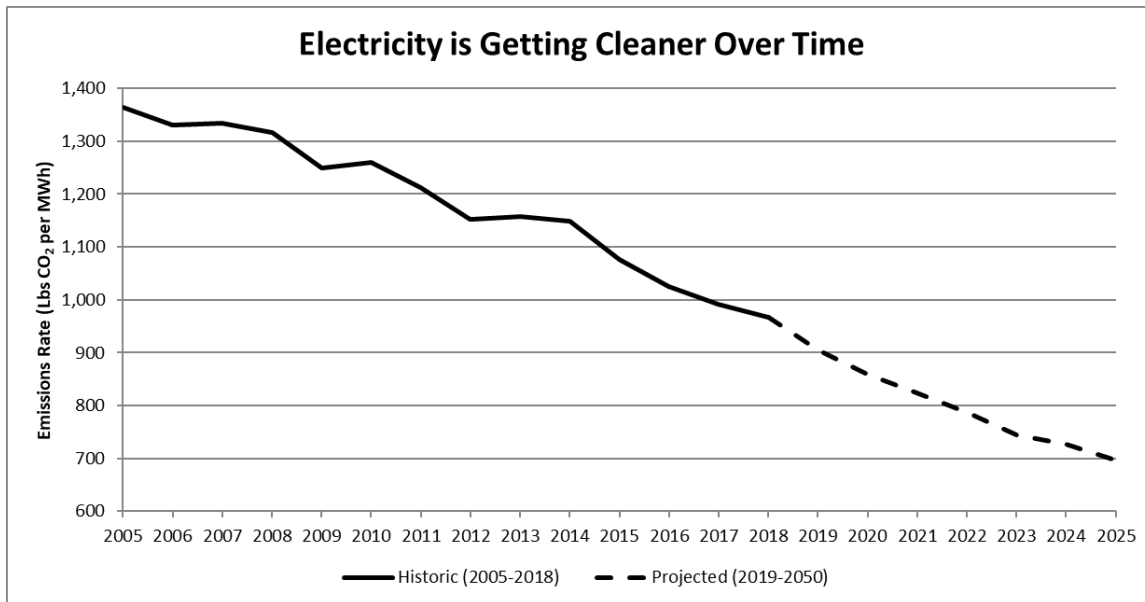
Members of the ICC 2019 Group B Appeals Board,

The National Rural Electric Cooperative Association (NRECA) appreciates the opportunity to submit comments on the appeal of RE126, which includes efficiency requirements for service water heaters in residential buildings.

NRECA represents more than 900 consumer-owned, not-for-profit electric cooperatives, public power districts, and public utility districts in the United States, powering 56% of the US landmass and over 20 million businesses, homes, schools and farms in 48 states.

**The Changes to Code Restrict Electrification Options at Critical Time When Expanded Electrification Opportunities are Needed**

In addition to the legal and technical issues outlined in the comments of the Edison Electric Institute's letter on this topic, which NRECA agrees with, the proposed changes in the code miss some of the most important trends in the industry- namely, the rapid decline in the carbon dioxide emissions of the electric sector and the impact that fact has on the role of electric water heating in homes. The proposed change limits electric water heating at the same time that emissions are rapidly falling. EIA has calculated that emissions from the electric sector have declined 28% since 2005, and the trend will continue into the future (see the figure below). As more renewable energy sources are integrated into the grid, it will be critical that electric water heating options are expanded, not **limited** by code. This code requires on-site renewable energy to allow for electric water heating, when many of the most needed and most impactful investments in renewable energy will be on the electric grid, not necessarily at the home. It also mandates that more expensive electric technology be used by consumers, which will hamper adoption. By focusing so narrowly on device and home-level solutions, the code is counterproductive to achieving objectives of cost-effective energy efficiency improvements that benefit consumers and the environment.



## Summary

For all of the reasons shown in EEI's comments on this issue, as well as the reasons above, we request that the Appeals Board take action to either revise RE126 so that it does not violate federal law or reject it due to its violation of federal laws as well as its negative impacts on the use of high-efficiency electric technologies.

Thank you for your review and consideration of our comments. Please feel free to contact any of the contact below if you have any questions about these comments.

Respectfully submitted,  
/s/

Keith Dennis, PE  
Vice President  
National Rural Electric Cooperative Association  
4301 Wilson Blvd., Arlington, VA 22203  
Keith.dennis@nreca.coop