



Edison Electric  
INSTITUTE

Customer Solutions

January 11, 2021

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

Re: Updating the IECC via the ICC Consensus Process

To whom it may Concern,

The Edison Electric Institute (EEI) appreciates the opportunity to submit comments on the the process for updating the next version of the International Energy Conservation Code (IECC 2024).

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States.

Driven by customer demands, technology developments, and federal and state regulatory obligations, the electric sector is undergoing a transition of its generating fleet that will continue over the next decade and beyond. Concurrent with this transition, EEI member companies are investing significant amounts of capital—over 124 billion dollars in 2019 alone—to make the energy grid smarter, more dynamic, more flexible, and more secure in order to integrate and deliver a balanced mix of resources from both central and distributed energy resources to customers.

### **EEI Supports the Use of the Consensus Process**

EEI has been involved with many consensus-based standards development organizations for many years. EEI has worked with the National Fire Protection Association (NFPA) on the National Electrical Code (NEC) and with the American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE) on commercial and residential building energy conservation standards (such as ASHRAE Standard 90.1).

EEI supports the recommendation of the Board Committee on the Long-Term Code Development Process as outlined in its Consensus Procedures document for the ICC to move to a more open process that allows for increased input from all interested parties.<sup>1</sup>

Specifically, EEI supports changes that afford increased representation of ICC members and other interested parties in the standards development process, including representation in committees and the opportunity to vote throughout the process. By providing more “seats at the table” the ICC and its committees will be well positioned to leverage stakeholder knowledge and expertise allowing for more detailed discussions of complicated and/or technical issues that arise when updating codes and standards. With some issues, it was not possible to have a full discussion during the code hearings given the time limits imposed (e.g., 1 or 2 minutes) to provide information in support or opposition to a proposed change. EEI also supports changes to voting requirements outlined in the Consensus Procedures document directing the ICC to achieve approval by two-thirds of those voting on new standards or reaffirmation of existing standards; revision or addendum to part or all of a standard; and changes to committee scope.<sup>2</sup>

### **EEI Suggests that ICC Adopt “Best Practices” from Other Consensus-Based Standards Development Organizations (SDO’s)**

If possible, ICC should review and, where possible, adopt the “best practices” of other SDO’s to improve the ICC Consensus Process.

For example, on certain ASHRAE committees, EEI has an organization membership, where there is a primary and alternate member (both approved by ASHRAE). This creates a “win-win” scenario, by allowing members the flexibility have more than one representative, and for the SDO, helps to improve the likelihood that all meetings will have a quorum of informed members for voting purposes.

Thank you for your review and consideration of our comments. Please contact Steve Rosenstock (202-508-5465, [rosenstock@eei.org](mailto:rosenstock@eei.org)) if you have any questions about EEI’s comments.

Respectfully submitted,

Steve Rosenstock, P.E.  
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<sup>1</sup> *ICC Consensus Procedures*, International Code Council, April 17, 2020 accessible at [https://www.iccsafe.org/wp-content/uploads/Revision-of-ICC-Consensus-Procedures\\_2-of-2-\\_revised-12.6.18B.pdf](https://www.iccsafe.org/wp-content/uploads/Revision-of-ICC-Consensus-Procedures_2-of-2-_revised-12.6.18B.pdf).

<sup>2</sup> *Ibid.*, pp. 7-8

cc: Adam Cooper