

Johnson & Associates Consulting Services – Analysis & Advocacy

August 28, 2020

To: Appeals Panel
International Code Council (ICC)

From: Greg Johnson
For: The Coalition for Fair Energy Codes
APA-the Engineered Wood Association (APA)
American Wood Council (AWC)

As interested parties in support of appeals made by the Leading Builders of American and the National Association of Homebuilders (NAHB) to the 2019 final action on International Energy Conservation Code items: RE21-19, RE29-19, RE32-19, RE33-19, RE36-19, RE37-19, RE126-19, RE145-19, RE147-19, RE151-19, RE182-19, RE184-19, RE192-19, RE204-19, RE209-19, CE12-19, CE49-19, CE56-19, CE217-19 Part II, and CE262-19:

We respectfully request that for the twenty code change proposals referenced above, the appeals panel:

1. Find that the intent of the code development process for complete consideration of code change proposals was violated.
2. Find that there was a material and significant irregularity of process resulting in the outcomes.
3. Find that there were other concerns with the Online Governmental Consensus Voting process which are material to the outcome or the disposition of the code change proposals.
4. Recommend to the ICC Board of Directors that the results of the Online Governmental Consensus Vote be set aside and the Final Action on these code change proposals be in accordance with the results of the Public Comment Hearing.

Relevant Citations:

1. Council Policy #1-03
 - a. Section 6.3.5
 - b. Section 6.3.8
 - c. Section 6.3.9
2. Council Policy #28-05
 - a. Section 2.1 Intent
 - b. Section 2.5 Code Development Record
 - c. Section 3.3.5 Supporting Information
 - d. Section 3.3.5.6 Cost Impact

- e. Section 5.1 (Committee Action Hearing) Intent
 - f. Section 5.4.3 Presentation of Material at the Public Hearing
 - g. Section 6.1 (Public Comments) Intent
 - h. Section 6.4.6 Cost Impact
 - i. Section 7.5.4 Presentation of Material at the Public Comment Hearing
 - j. Section 8.1 Public Comment Hearing Results
 - k. Section 8.2 Online Governmental Consensus Ballot
 - l. Section 10.2 Voting Irregularities
 - m. Section 13.1 ICC Board Action on Violations
3. ICC Bylaws
- a. Section 1.2 General Purposes
 - b. Section 5.7 Authority

For all but one of its codes, the ICC code development process has many years of successful production of model codes developed through formal debate and the complete consideration of the arguments for and against the modification of the code. Thousands of code change proposals have been considered through the process and hundreds advanced successfully through final action.

Of the many successful code change proposals, they were the result of debate and approval at the Committee Action Hearings (CAH) with no subsequent public comment, or they were proposals with public comments that were debated and approved at the Public Comment Hearing (PCH) to advance as an affirmative motion in the Online Governmental Consensus Vote (OGCV). This has been the regular order of business, that at either the first or second step complete consideration of the successful proposal or public comment by the voting body supported advancing the proposal. In no case prior to the OGCV on IECC proposals in 2019 had a proposal that had failed the action of the Code Development Committee (CDC) and failed through the action of the assembly of voters at the PCH been successfully passed through the OGCV.¹

CP28 anticipates that a proposal that failed at the CAH and the PCH can still successfully pass with a two-thirds majority in the OGCV [Sec. 8.1]. Although unusual, given the history of never having occurred before, such an outcome for a proposal, or perhaps a handful of proposals, could be deemed regular as anticipated by CP28.

Absent any other exculpatory evidence, it can be assumed that, theoretically, such a proposal or handful of proposals received the complete consideration intended by the process [Sec. 2.1] and that the

voters participating in the OGCV availed themselves of the complete record of documentation, debate, and previous actions required by CP28 [Sec. 2.5; Sec. 8.2], including the video record.

According to CP 28 the intent of the code development cycle is the complete consideration of code change proposals in accordance with CP28 [Sec. 2.1]. CP28 dictates information that must be provided to ensure complete consideration of code change proposals including a requirement for testifiers in the process to identify their affiliation or representation [Sec. 5.4.3; Sec. 7.5.4] and for proponents of code changes or public comments to provide the cost impacts associated with the code change proposal or comment [Sec. 5.1; Sec. 6.4.6].

There is no way for an OGCV voter to consider the representation or affiliation of testifiers without watching hearing video. Without watching the video consideration is incomplete.

Regarding cost impacts, CP28 states that the intent of the committee action hearing *“is to permit interested parties to present their views including the cost and benefits on the code change proposals on the published agenda.”* [Sec. 5.1]. It can be inferred, that since cost impact is information also required to be provided with a public comment, that the information is to be made available for the debate of the comment so that the assembly has that information when voting.

There is no way for an OGCV voter to consider the views of costs and benefits provided by testifiers without watching hearing video. Without watching the video consideration is incomplete.

The circumstances which lead to the OGCV approval of the twenty code changes considered by this document cannot by any reasonable measure be considered regular. Nor do they suggest that the complete record of the proposals was considered by the online voters given that all twenty code changes were recommended for approval by voting guides² issued by an industry group,ⁱ the Energy Efficient Codes Coalition (EECC).³

Cross referencing the EECC voting guide with the results of the code development process⁴ shows that the voting guide recommended action on sixty-two commercial code change proposals,⁵ of which three were not acted upon in accordance with the guide, and two of those three only failed to achieve the two-thirds supermajority by one (1) vote, while the remaining proposal failed by six (6) votes out of nine hundred and eighty (980) cast.

ⁱ The Energy Efficient Codes Coalition has a mixed membership of social policy advocacy organizations and trade associations representing the manufacturers of products used in the building envelope. Members have an interest in creating additional market for those products through model regulation.

Voting for commercial proposals on which the EECC guide had a position averaged nine hundred and twenty (920) online votes consistent with the EECC recommendation, with a range of six hundred and eighty to one thousand and ninety-seven (680 to 1,097) votes. This contrasted with proposals with no EECC recommendation which averaged three hundred and seventeen (317) online votes in support of the prevailing position, with a range of two hundred and thirty-seven to four hundred and fourteen (237 to 414) online votes. Generally, EECC supported actions on commercial energy provisions had six hundred (600) more voters in support than items the EECC guides did not address and the EECC position prevailed ninety-five percent of the time.

The results of online voting for residential energy code provisions similarly correlate with the fifty-five recommendations of the EECC residential voting guide,⁶ of which fifty-two prevailed, also, with rounding, ninety-five percent of the time. The average number of online votes cast in favor of EECC positions was seven hundred and ninety-one (791) while the average in favor of the prevailing position for proposals not addressed by EECC was two hundred and sixty-eight (268), a difference of five hundred and twenty-three (523). Generally, EECC supported actions on residential energy provisions had more than five hundred (500) more voters than voters supporting actions on items the EECC guides did not address.

Voting guides are a normal part of complete consideration in ICC's code development process, treated by CP28 as "*other material submitted in response to a code change proposal or public comment*" to "*be located in a designated area in the hearing room.*" [Sec. 5.4.3; Sec. 7.5.4] and are frequently distributed by other means by ICC chapters, advocacy groups and industry. Indeed, NAHB produces a voting guide to reflect recommendations of the homebuilding industry and APA and AWC inform voters of the wood products industry's position on given issues.

NAHB, APA, and AWC recommendations, by nature of the issuing organizations, clearly reflect the economic interest of the parties recommending specific actions on code change proposals, contributing to complete consideration of those proposals, and meeting the intent for full disclosure of representation required by CP28 [Sec. 5.4.3; Sec. 7.5.4] for presenters of materials at hearings.

The EECC guides, which evidently determined the outcome of the voting on one hundred and eleven of one hundred and seventeen (ninety-five percent) of the proposals addressed by the guides, do not disclose that they represent the material interests of product manufacturers with financial interest in the outcomes of the proposals for which they made a recommendation. In this regard the EECC guides fail to contribute to complete consideration of the addressed code change proposals.

The EECC guides suggest that voters review a portion of the record of the code developments process, stating: "*This document is not intended as a substitute for reviewing and assessing the actual proposals*

and public comments as published by ICC, and we encourage a full review.” The EECC guides however do not encourage voters to view the video recording of the CAH and PCH, which is the only way that non-attendees can completely consider the code change proposals. Reviewing the reasons for proposals and public comments will present only the proponents’ perspective of a proposed change. Only by viewing the video can an OGCV voter consider opponents’ testimony; only by viewing the video can complete consideration occur.

In addition to providing voting guides, EECC provided a document titled “How to Vote Using EECC’s Voting Guides.”ⁱⁱ This document provides complete instructions on how to log into cdpACCESS and locate the proposals for which EECC provided recommendations. The document tells voters to “*Make your selections, using the EECC Voting Guides. For more information about a proposal, you can use the detailed EECC residential and commercial voting guides, or click on “View Ballot” underneath each proposal number.*” The document does not suggest reviewing the video record of debate of any proposed change, discouraging, through omission, the complete consideration of code change proposals. The omission of resources needed by OGCV voters for complete consideration of energy code proposals is reinforced by the ‘Voters’ page on EECC’s website,⁷ which says, “*EECC’s Voting Guide can help you identify the most critical proposed changes and give you the information you need to help you decide how to vote.*”

For ninety-seven of the one hundred and seventeen EECC recommended positions the outcome was consistent with the regular outcomes of the ICC code development process; either a proposal was disapproved, or a proposal to change the code succeeded after succeeding at either the CAH or PCH. In these cases, complete consideration of the code change proposals can be assumed since the outcomes were consistent with the determinations of the bodies (the CDC at the CAH or the eligible voters assembled at the PCH) who were present for complete consideration of the code change proposals. In other words, those voting bodies heard interested parties identify their affiliation and representation and present their views including on the cost and benefits of the code change proposals as anticipated by CP28 [Sec. 3.3.5.6; Sec. 5.1].

Twenty of the EECC recommended proposals however succeeded through the OGCV without having succeeded at either the CAH or PCH. This strongly infers that the supermajority required of OGCVs was obtained without the complete consideration intended for those items.

ⁱⁱ See Appendix B

Given the de facto control of IECC voting in the 2019 OGCV by the EECC, it is helpful to understand, to the extent possible, who EECC represents. The EECC website says, “*EECC’s supporters include a diversity of businesses, **trade associations**, energy efficiency organizations, environmental groups, and consumer advocates that understand how homeowners, tenants, businesses, and state and local governments all benefit from steady increases in energy efficiency in the built environment.*”⁸ <emphasis added> EECC also says that it was originally established by the Alliance to Save Energy (ASE)⁹ and the ASE website identifies the EECC website as an “other Alliance Website.”¹⁰

EECC’s voting guides say that, “*The summaries and recommendations below reflect careful consideration by the EECC Technical Committee and, as such, represent the EECC’s views at this time.*” The EECC website does not speak to a technical committee and so does not identify its members.

ASE, founder of EECC, does identify a committee addressing building envelopes. The ASE website provides a “Building Envelope Charter” for a “Building Envelope Technologies Subcommittee,”¹¹ initially chaired by a manufacturer of building envelope products. “Building Envelope Membership”¹² identifies a committee dominated (eleven of thirteen members) by the manufacturers of building envelope and other energy related products.

EECC representatives have successfully lobbied the United States Conference of Mayors (US Mayors) to adopt resolutions broadly supporting EECC’s agenda¹³ and frequently cite those resolutions as justification for EECC’s proposed code changes.^{14,15,16,17} These resolutions are policy documents and do not address the technical substantiation and cost-benefit impacts as does the ICC’s code development process [CP28, Sec. 3.3.5.3; Sec. 3.3.5.6]. In other words, they do not reflect complete consideration of any code change considered at any stage of the ICC’s process. Nonetheless, at least some of the jurisdictions represented by the US Mayorsⁱⁱⁱ appear to have joined the ICC in 2019 for the express purpose of voting in accordance with the EECC voting guide.¹⁸

Analysis of the ICC governmental members that joined the ICC in 2019 in time to qualify for the OGCV^{iv} reveals that about six hundred new governmental voting representatives (GMVRs) were added in time to qualify and that several geographic areas and jurisdictions were prominent in the makeup of the new voters. For example, the State of Massachusetts contributed around two hundred and sixty or forty-three percent of the new GMVRs. By purchasing nine ICC memberships the City of Newton, MA, with an

ⁱⁱⁱ The US Conference of Mayors represents cities with populations of 30,000 or more, of which there are 1,400 plus. According to statista.com there are more than 37,000 cities, towns, and villages with populations smaller than 30,000.

^{iv} See Appendix A, 2019 New ICC Members Voting on the IECC

estimated population of eighty-nine thousand¹⁹ contributed fifty-four of the newly added GMVRs or nine percent of the total.

The addition of about six hundred new GMVRs correlates directly with the additional five to six hundred added GMVRs voting on IECC proposals upon which the EECC guides took a position.

While CPI, the ICC policy on appeals, precludes decisions on the relative merits of technical matters [Sec. 6.3.7], examination of the nature of some of the of the contended code change proposals is useful to establish incomplete consideration in the OGCV. Selected proposals that passed ‘As Submitted’ after failing at the CAH and the PCH assembly vote:

- RE21-19; Committee reason for disapproval: Confusing language related to area weighted average, and it would require an ERI score both with and without onsite generation (Vote: 10-1).²⁰ Sixty-seven percent of PCH voters voted to sustain the committee.²¹
- RE29-19; The proponent, in response to a committee question of what the cost to an owner or builder would be to implement the code change proposal, said, of the two climate zones addressed by the proposal, that he did “*not have the specific incremental cost number for each climate zone.*”²² Sixty-three percent (rounded) of PCH voters voted to sustain the committee.²³
- RE33-19; The reason statement for the proposal estimated forty-two dollars in savings over a thirty-year period,²⁴ based upon less than one percent annual energy savings. Testimony²⁵ indicated the upfront cost for the measure to be more than one thousand dollars. The committee reason and vote for disapproval: Insufficient cost justification (Vote: 9-2).²⁶ Sixty-three percent (rounded) of PCH voters voted to sustain the committee.²⁷
- RE36-19; In response to a committee question regarding the initial cost of the measure the proponent admitted to only considering the additional costs of insulation and not considering the additional costs of structural modifications necessary to implement the code change proposal for a projected energy savings of much less than one percent annually.²⁸ The committee reason for disapproval: “It impacts buried ducts, raised trusses and air barriers. The energy savings is within the margin of error” (Vote: 11-0).²⁹ Sixty-five percent of PCH voters voted to sustain the committee.³⁰
- RE37-19; The committee reason for disapproval: No technical data was provided, the cost savings were not justified, there is no energy savings (Vote: 8-3)³¹ Seventy-seven percent (rounded) of PCH voters voted to sustain the committee.³²
- RE207-19; The committee reason for disapproval: Proponent requested disapproval as an opportunity to provide greater transparency of analysis and work with opponents to resolve

issues (Vote: 11-0).³³ Fifty-seven percent (rounded) of PCH voters voted to sustain the committee.³⁴

- CE56-19 The committee reason for disapproval: “Encourage the proponent to bring it back in public comment with corrected formatting, issues include using italics in the definition, putting the 180 day requirement in the definition, the definition of internal curtain system, and there is some disconnected code language” (Vote: 12-3).³⁵ Sixty-three percent of PCH voters voted to sustain the committee.³⁶
- CE262-19 Proponent asked for disapproval for lack of coordination with the International Fire Code and the National Electrical Code.³⁷ (Note that the IECC voting guide provided no reason for why this proposal should be approved – just that it should).³⁸ PCH voters failed to pass the public comment that would have corrected the deficiencies identified by the proponent at the CAH.³⁹

The nature of the above referenced code changes strongly suggests that not all would have passed if the OGCV provided complete consideration of the proposal as intended by CP28 [Sec. 2.1]. Admitted lack of cost justifications by the proponents, examples of poorly drafted language, and proposals which were requested for disapproval by proponents because of flaws would regularly result in OGCV disapprovals rather than passage by achieving the required supermajority in the OGCV. The fact that so many of these types of proposals passed reflects a lack of complete consideration and demonstrates voting irregularities.

For twenty of such code change proposals this is not just a voting irregularity, but also a concern with the OGCV process, as it relates to the IECC, which is material to the outcome and disposition to those code changes. CP28 addresses both voting irregularities and “*other concerns with the OGCV process,*” specifically permitting the ICC Board of Directors to set aside the results of the OGCV and declare the Final Action on all code change proposals to be in accordance with the results of the PCH [Sec. 10.2].

The Appeals Board, by virtue of the authorities granted by CP1 [Sec. 6.3.5; Sec. 6.3.9] can verify lack of complete consideration on the twenty code change proposals challenged by this document. ICC information technology staff can verify whether the OGCV voters accessed the video records of the CAH and PCH before casting their ballots on these twenty items. Failure to review the complete record is de facto a lack of complete consideration and reason enough to set aside those ballots in favor of the PCH result.

The Appeals Board should also find that the failure by more than five hundred OGCV voters to completely consider the relevant code change proposals is a material and significant irregularity of the process and the appeals by the Leading Builders of America and the National Association of Home Builders should be sustained in accordance with CP1 [Sec. 6.3.8].

In addition to the evidence of voting irregularities, there is a concern that the OGCV process has, for the twenty proposals in question, rendered an outcome that made all prior elements of the code development process not just moot, but also meaningless. There is no point to an energy code development process where an industry establishes the outcome and de facto directs the voting to assure that outcome.

The circumstances associated with the EECC voting guides and OGCV for the twenty proposals being challenged are a threat to the credibility of the ICC code development process for IECC development and not in the best interest of the ICC and its membership. As an administrative action, consistent with the authority granted by the ICC Bylaws [Sec. 5.7], the ICC Board should set aside the result of the OGCV on the twenty identified proposals in the best interest of the ICC and its membership. By this action, the ICC Board can maintain the integrity of the code development process as intended by CP28 [Sec. 13.1].

Further, there is sufficient evidence to demonstrate that some number of the twenty identified proposals will be unsatisfactory for adoption by local government because of lack of cost justifications, poorly drafted language, poorly correlated provisions, and changes in code provisions which were requested to be disapproved by proponents because of flaws. Advancing this type of content in a model code is a disservice to adopting governments and will create additional burdens from and for their use of the IECC. This conflicts with the general purposes of the ICC as details in its Bylaws [Sec. 1.2].

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- ¹ https://www.iccsafe.org/wp-content/uploads/ICC_Report_Code_Dev_Process_2019_Group_B_Cycle.pdf
 - ² <https://energyefficientcodes.org/wp-content/uploads/EECC-Top-Priority-Voting-Guide.pdf>
 - ³ <https://energyefficientcodes.org/about/>
 - ⁴ https://www.iccsafe.org/wp-content/uploads/2019-Group-B-Final-Action_incl-OGCV.pdf
 - ⁵ <https://energyefficientcodes.org/wp-content/uploads/EECC-CE-Online-Voting-Guide-11-8-19.pdf>
 - ⁶ <https://energyefficientcodes.org/wp-content/uploads/EECC-RE-Online-Voting-Guide-11-8-19.pdf>
 - ⁷ <https://energyefficientcodes.org/voters/>
 - ⁸ <https://energyefficientcodes.org/about/>
 - ⁹ Ibid.
 - ¹⁰ <https://www.ase.org/buildings>
 - ¹¹ Ibid.
 - ¹² Ibid.
 - ¹³ <https://energyefficientcodes.org/wp-content/uploads/2019-07-1-Putting-the-IECC-on-a-Glide-Path-to-Net-Zero-Energy-Buildings-by-2050.pdf>
 - ¹⁴ <http://hearingvideos.iccsafe.org/videos/re206-19/>
 - ¹⁵ <http://hearingvideos.iccsafe.org/videos/re206-19-2/>
 - ¹⁶ <http://hearingvideos.iccsafe.org/videos/re29-19-2/>
 - ¹⁷ <http://hearingvideos.iccsafe.org/videos/re36-19-2/>
 - ¹⁸ https://www.iccsafe.org/wp-content/uploads/20-18599_CORP_Validation_RPT_AppendixA_FINAL.pdf
 - ¹⁹ https://en.wikipedia.org/wiki/Newton,_Massachusetts
 - ²⁰ <https://www.iccsafe.org/wp-content/uploads/GROUP-B-2019-REPORT-OF-THE-COMMITTEE-ACTION-HEARING.pdf>
 - ²¹ <http://hearingvideos.iccsafe.org/videos/re21-19-2/>
 - ²² <http://hearingvideos.iccsafe.org/videos/re29-19/>
 - ²³ <http://hearingvideos.iccsafe.org/videos/re29-19-2/>
 - ²⁴ <http://media.iccsafe.org/code-development/group-b/2019-Group-B-CAH-compressed.pdf>
 - ²⁵ <http://hearingvideos.iccsafe.org/videos/re33-19/>
 - ²⁶ <https://www.iccsafe.org/wp-content/uploads/GROUP-B-2019-REPORT-OF-THE-COMMITTEE-ACTION-HEARING.pdf>
 - ²⁷ <http://hearingvideos.iccsafe.org/videos/re33-19-2/>
 - ²⁸ <http://media.iccsafe.org/code-development/group-b/2019-Group-B-CAH-compressed.pdf>
 - ²⁹ <https://www.iccsafe.org/wp-content/uploads/GROUP-B-2019-REPORT-OF-THE-COMMITTEE-ACTION-HEARING.pdf>
 - ³⁰ <http://hearingvideos.iccsafe.org/videos/re36-19-2/>
 - ³¹ <https://www.iccsafe.org/wp-content/uploads/GROUP-B-2019-REPORT-OF-THE-COMMITTEE-ACTION-HEARING.pdf>
 - ³² <http://hearingvideos.iccsafe.org/videos/re37-19-2/>
 - ³³ <https://www.iccsafe.org/wp-content/uploads/GROUP-B-2019-REPORT-OF-THE-COMMITTEE-ACTION-HEARING.pdf>
 - ³⁴ <http://hearingvideos.iccsafe.org/videos/re207-19-2/>
 - ³⁵ <https://www.iccsafe.org/wp-content/uploads/GROUP-B-2019-REPORT-OF-THE-COMMITTEE-ACTION-HEARING.pdf>
 - ³⁶ <http://hearingvideos.iccsafe.org/videos/ce56-19-2/>
 - ³⁷ <http://hearingvideos.iccsafe.org/videos/ce262-19/>
 - ³⁸ <https://energyefficientcodes.org/wp-content/uploads/EECC-CE-Online-Voting-Guide-11-8-19.pdf>
 - ³⁹ <http://hearingvideos.iccsafe.org/videos/ce262-19-2/>

City of Phoenix Dept of Sustainability	8									8									
City of Portland Planning & Sustainability	9										9								
City of Quincy Planning Department	3	3																	
City of Quincy Public Buildings Dept	4	4																	
City of Saint Paul Plan & Economic Dev	9								9										
City of Seattle Office of Sustainability and Env	7											7							
City of Somerville City Council	8	8																	
City of Somerville Sustainability Dept	8	8																	
Colorado Department of Natural Resources	6		6																
Colorado Dept of Public Health & Env	9		9																
Denver Department of Environmental Health	12		12																
Denver Department of General Services	5		5																
Department of Energy & Environment	12												12						
Devens Enterprise Commission	2	2																	
Honolulu Board of Water Supply	9													9					
Honolulu Climate Change, Sustainability & Resiliency	11														11				
Honolulu Dept of Design & Construction	9														9				
Honolulu-Dept of Facility Maintenance	4														4				

Town of Framingham	6	6																		
Town of Gill	1	1																		
Town of Great Barrington	3	3																		
Town of Natick Public Works, Facilities	4	4																		
Town of Wayland Planning Dept	4	4																		
Town of Winchester	1	1																		
Town of Winthrop	1	1																		
Virginia Dept of Mines, Minerals, and Energy	4																4			
Wakefield Environmental Sustainability	3	3																		
Warwick Buildings & Energy Committee	3	3																		
Wellesley Board of Selectmen	1	1																		
Wellesley Sustainable Energy Committee	4	4																		
Westborough Sustainable Dept	3	3																		
Worcester Economic Development	6	6																		
Worcester Energy and Asset Management	4	4																		
SubTotal		263	63	8	51	10	16	24	12	8	29	26	12	33	1	12	7	12	11	3
Total	601																			
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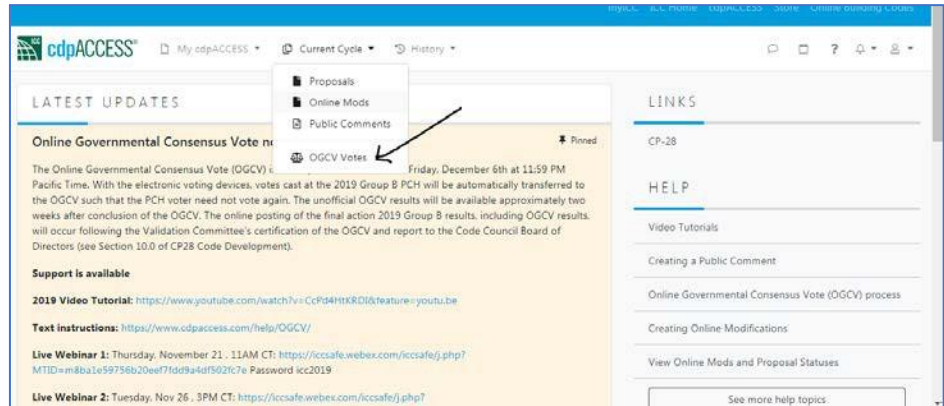
Appendix B How to Vote Using EECC's Voting Guides



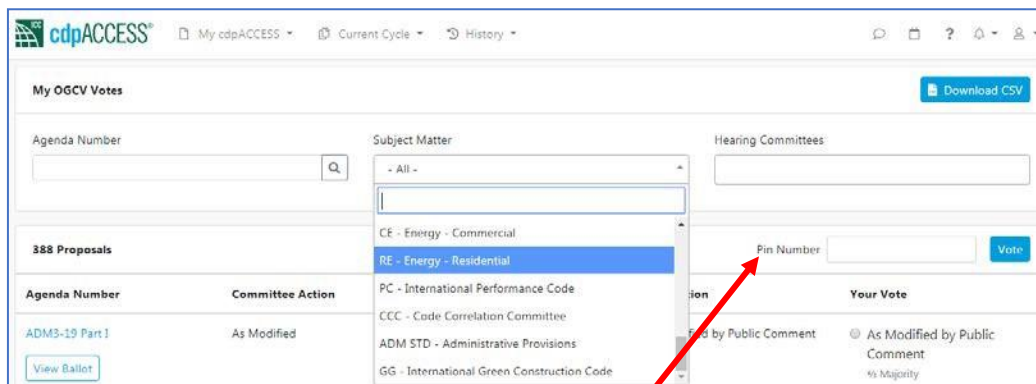
How to Vote Using EECC's Voting Guides

This information was derived from ICC's "How to Vote" video, available here: <https://www.youtube.com/watch?v=CcPd4HtKRDI>

1. Log on to cdpAccess (www.cdpass.com) and click the "Current Cycle" drop down button
2. Click on "OGCV Votes"



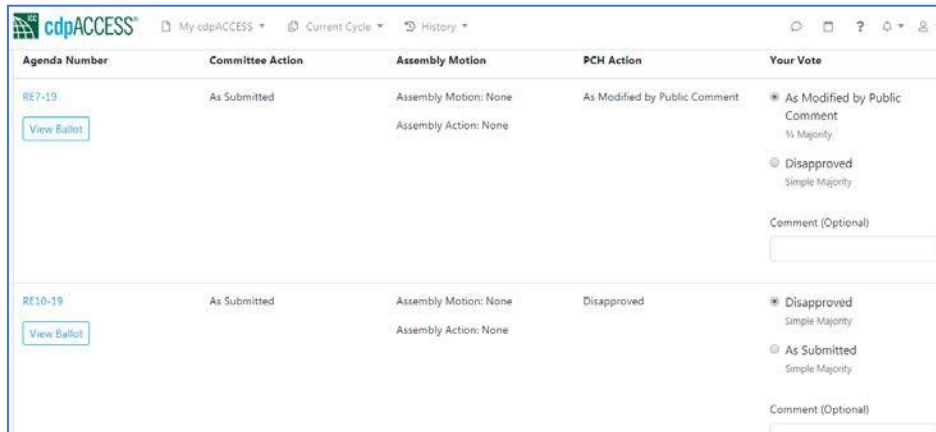
3. Click on the "Subject Matter" drop down button and navigate to 'CE – Energy – Commercial' (for the IECC Commercial proposals) or 'RE – Energy – Residential' (for the IECC Residential proposals).
(Note: If you want to search for a specific proposal, we recommend you search by **subject matter, as it will be consistent with the EECC voting guides for **residential** and **commercial** proposals. You can also sort by which hearing committee heard the original proposal but be aware that the residential committee heard some of the CE proposals, and vice versa).**



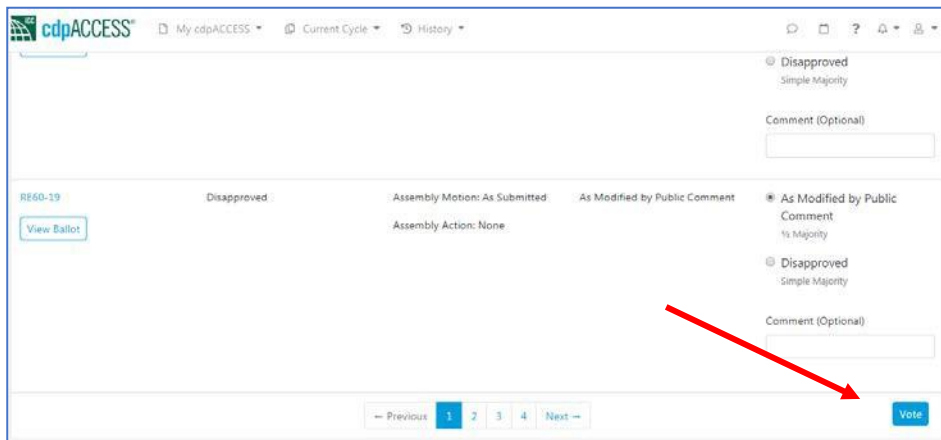
4. Enter your PIN number from the right side of screen (4 digits, you select upon registering). Your PIN is valid for 30 minutes, then you'll be prompted to enter it again.
 - If necessary, you can reset your PIN at iccsafe.org/cdpPIN (or use the password reset area of ICC's website)
 - For help, you can either: click the question mark icon in the top right corner of web page, email cdpass@iccsafe.org or call ICC Member Services at **(888) 422-7233, ext 33804**

Appendix B How to Vote Using EECC’s Voting Guides

5. Make your selections, using the [EECC Voting Guides](#). For more information about a proposal, you can use the detailed EECC [residential](#) and [commercial](#) voting guides, or click on “View Ballot” underneath each proposal number. There should be about 20 proposals per page.



6. Click “VOTE” when you get to the end of each page to save your record before moving on to the next page. Continue through all pages until all your votes are cast! *(Remember to vote for residential AND commercial proposals, by toggling through the “Subject Matter” drop-down button (see step #3)).*



7. CONFIRM ALL YOUR VOTES WERE CAST (helpful / not required): Download your full voting record by clicking on “Download CSV” button in upper right corner of screen.

