

THE CITY OF PHILADELPHIA
— OFFICE OF —
SUSTAINABILITY

August 12, 2020

Members of the 2019 Group B Appeals Board, Mr. Wheeler, and Mr. Sims,

The City of Philadelphia's Office of Sustainability had the opportunity to participate in the 2021 IECC voting process this year. We were relieved to read in April that the challenges were not upheld by the Validation Committee and review of the ICC Board of Directors. We recently learned these same challenges have been resurfaced as appeals. I am writing, on behalf of my office, to encourage you to uphold the outcomes of this voting process.

We'd like to address three main areas of the appeals:

1. **The attempt to overturn the online vote:** Our voting representatives followed the rules laid out by the ICC in the voting process, and in doing so overturned some proposals that were disapproved at the committee level and at the hearings in Las Vegas. Our needs may be different than those represented by the committee or the members in Las Vegas, but that does not make our needs less valid.
2. **The attempts to remove electrification measures from the code:** We heard at various points in the hearings testimony that the IECC may not be the right place for these measures, but following the rules that were put before us we chose, as many did, to disagree. We know that to meet the needs of our city, electrification is a critical piece of energy planning and conservation to meet our climate goals. Our actions were informed and deliberate – to help us move our energy codes forward, measures that help us plan for electrification must be included.
3. **The attacks on our credentials to be voters:** A lot of effort was made by our staff to follow the ICC guidelines to become members, register governmental voting representatives, engage in understanding the proposals, and vote using the cdpAccess tool. Among our voting members were staff from the Energy Office, housed within the Office of Sustainability, including the City Energy Manager who is a mechanical engineer with over a decade of experience in energy procurement, building science and renewable energy and energy efficiency programs. There should be no question about the expertise of our highly skilled staff. Given limited budgets for travel to participate in multiple iterations of the code development process, the open voting period was an excellent opportunity for many of our staff to be engaged in this process. We believe it is of great benefit to have a larger percentage of eligible voting members participate in the code development process. We believe we followed the rules to become members, and that our voters are informed and knowledgeable on the issues put in front of them and the needs of our city. The attack on our understanding of what we voted on without knowing our voters is unfounded.

Thank you to you and your staff for maintaining the integrity of this system. I encourage you, again, to uphold these voting results. Thank you for your consideration.

Sincerely,



Christine Knapp
Director