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January 11, 2021

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

Re: MEEA's comments in support of maintaining the current IECC development process

Dear International Code Council Board of Directors,

Thank you for the opportunity to provide comments on the proposed change to the development process of the International Energy Conservation Code (IECC) to follow the ICC Standards process. The Midwest Energy Efficiency Alliance (MEEA) supports maintaining the current IECC development process, allowing the critical opportunity for state and local governments to make their voices heard.

The Midwest Energy Efficiency Alliance (MEEA) is a regional non-profit membership organization which serves as the Midwest's key proponent and resource for energy efficiency. MEEA covers 13 states in the Midwest and serves as a non-partisan resource to our 160+ members, which include utilities; energy efficiency service and technology providers; manufacturers; state and local government representatives; and others.

As the trusted source on energy efficiency in the Midwest, MEEA educates and advises a diverse set of stakeholders on new and meaningful ways to pursue an energy efficient agenda that's both achievable and cost-effective. In particular, MEEA's Building Policy team has extensive expertise in building energy codes. We have been heavily involved in assisting states and municipalities with the adoption of and compliance with building energy code policy in the Midwest since 2009.

MEEA strongly urges the board to maintain the use of the Government Consensus process currently used to develop the IECC, which has been historically successful at developing a relevant energy code that consistently and cost-effectively improves building efficiency. Switching to the ICC Standards process would eliminate critical voices necessary to get essential buy-in from local governments. Input and approval from governmental members is what makes the IECC a code that states and municipalities want to adopt. Transitioning the development of this code to follow the ICC Standards process would exclude the stakeholders primarily responsible for adopting and enforcing building codes and would weaken the value these stakeholders place on the development process and the efficacy of the IECC.



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One of the reasons state and local governments in the Midwest adopt the IECC is because of the rigorous development process the code goes through before it is published. The opportunity for governmental members to vote on the measures included in the model energy code assures state and local governments that the published code is suitable for adoption in their jurisdictions and provides an appropriate trajectory for advancing building energy efficiency. While the ICC standards process could theoretically expedite the development of the IECC, there is no guarantee that it will. Meanwhile, moving to the standards process would extinguish critical feedback from the end users of the code who ultimately understand the building energy efficiency needs of their regions best. Further, eliminating the opportunity for broad stakeholder engagement in the process will lead to a less inclusive code development process that may lower IECC adoption rates as state and local governments adopt alternative codes to better meet their needs.

MEEA strongly opposes the elimination of the IECC as a code and replacing it with a standard. Eliminating the voting rights of state and local governments in the IECC development process would have significant negative long-term impacts on building energy efficiency and would likely reduce the adoption of the IECC across the Midwest. Transitioning the development to the ICC Standards process would also remove the important aspect of transparency currently provided by the Governmental Consensus Process.

If you have any questions about this testimony, please contact Nicole Westfall, Building Policy Manager at MEEA, at nwestfall@mwalliance.org.

Sincerely,

A handwritten signature in black ink that reads "Stacey Paradis".

Stacey Paradis
Executive Director