



Bruce J. Swiecicki, PE  
Senior Technical Advisor

August 11, 2020

Mr. Mike Pfeiffer  
ICC Staff  
Country Club Hills, IL

Re: Appeal of RE126-19

Hello Mike:

I am writing in support of appeals submitted by the American Gas Association, the American Public Gas Association and the Air Conditioning, Heating and Refrigeration Institute on their appeals of the action taken to approve proposal RE126-19 as submitted.

Proposal RE126-19 would effectively institute new energy efficiency requirements for water heaters. However, appliance energy efficiency requirements are under the sole purview of the U.S. Department of Energy through the enactment of the Energy Policy and Conservation Act of 1975. As a result, the adoption of RE126-19 would create a conflict with federal regulations that have preemptive authority over state or local regulations.

Concluding, the National Propane Gas Association supports the appeal that would overturn the Final Action on RE126-19 and disapprove the code change. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Bruce J. Swiecicki". The signature is written in a cursive, flowing style.