



Bruce J. Swiecicki, PE
Senior Technical Advisor

August 14, 2020

Mr. Mike Pfeiffer
ICC Staff
Country Club Hills, IL

Re: Appeal of CE217-19, Parts 1 and 2

Hello Mike:

I am writing in support of appeals submitted by the American Gas Association and the American Public Gas Association on their appeal of the action taken to approve proposal RE126-19 as submitted.

Proposals CE217-19 Parts 1 and 2 cross a boundary from a code based on scientific data that recognizes a competitive marketplace into a document that can easily be viewed as a marketing windfall for the electric vehicle industry, all at the expense of the free marketplace.

Even the proponents of the proposal admit as much when it is stated, "However, the lack of access to EV charging stations continues to be a critical barrier to EV adoption." The approval of CE217-19 represents the ICC "choosing a winner" in the competitive alternative fueled vehicle marketplace and this should not be allowed to occur. It is no different than adopting a requirement for all new structures to be provided with a gasoline or a propane vehicle dispenser.

The fact that not everyone owns an electric vehicle should be sufficient to overturn the adoption of CE217-19. The vast majority of the population drives vehicles powered by other fuels and therefore, building owners (and hence the general public) will be paying a tariff to subsidize the installation of devices that only a very small percentage of the population uses or needs.

Concluding, the National Propane Gas Association supports the appeal that would overturn the Final Action on CE217-19 Parts 1 and 2 by disapproving the code change. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Bruce J. Swiecicki". The signature is written in a cursive style with a large, prominent "B" and "S".