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January 11, 2021

Mr. Greg Wheeler, CBO
President, International Code Council
City of Thornton
9500 Civic Center Drive
Thornton, CO 80229

Mr. Dominic Sims
CEO, International Code Council
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001

Dear Mr. Wheeler and Mr. Sims,

This letter is in response to the request for written comments by January 11 regarding the potential changes to the International Energy Conservation Code (IECC). My understanding is that the process changes being considered would effectively remove the Governmental Members from the voting process on future IECC updates.

The Vermont Public Service Department (PSD) has actively been expanding its participation in the code development process. This includes sharing our knowledge and experience updating and modifying the codes to better suit Vermont with other state energy offices, as well as participating in as many committee hearings as practicable. Additionally, we provide commentary and support by working with parties that are actively contributing to code change proposals. Our experience of working with ICC and other interested parties inform these comments.

While the current structure may not be perfect, the proposal to move the development process to a Consensus Committee can only be viewed as detrimental to the energy code. The current development structure ensures that the opinions of states like Vermont and diverse communities across the country that are ultimately responsible for the codes within their jurisdiction are given the weight they are due. While there is seldom universal agreement on every proposal, all of those that vote acknowledge the importance of building codes, as expressed by participating in voting democratically. Removing the ability of Governmental Members to vote on future content of the International Energy Conservation Code (IECC) will hinder the adoption of energy codes

nationwide. The proposed empowerment of a consensus committee would result in energy codes developed by those who have enough financial resources to shape of the code to their own benefit and not necessarily that of the public. The IECC is respected and used widely because of its current process – the proposed changes would jeopardize its future.

By removing those who are responsible for adopting and implanting the codes, smaller states like Vermont, as well as less well funded interest groups, would have little to no input into code development. This would slow or even reverse the advancement of energy code nationwide as those who would normally adopt the IECC, either wholly or modified, could be required to expend resources to modify the code or even create their own energy codes to address deficits created by the removal of governmental members from the process.

Vermont PSD hopes the ICC will continue its commitment to an inclusive process for building energy codes development. We look forward to continuing that work with you. Together, let us ensure that building codes advance with broad stakeholder input while supporting the safety, resilience, and energy efficiency of buildings in the United States.

Thank you for the opportunity to comment. Please feel free to contact our office with any questions or concerns.



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