



National Association of  
State Energy Officials

February 24, 2020

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,

On behalf of the National Association of State Energy Officials (NASEO) and the 56 State and Territory Energy Director members and their offices we would like to commend the International Code Council (ICC) for creating and executing an effective and inclusive code development process this cycle thus far.

NASEO’s members participated in the code development process at every step of the way, sharing their knowledge and experience as committee members, by offering testimony, and by contributing to code change proposals. NASEO members from across the country work in the administration, formulation, and implementation of laws, rules and regulations relating to the public health, safety and welfare through state building energy codes. For example, the International Energy Conservation Code (IECC) Commercial Committee included state energy officials from the Oregon Department of Energy and the Massachusetts Department of Energy Resources, who sat on the dais at the Committee Action Hearing in Albuquerque. Representatives from other states sat in the audience and offered testimony on code change proposals at the Committee Action Hearing.

At the Public Comment Hearing, state energy officials from several states, including one office that dedicated five full days of participation from the State Energy Office Director and Deputy Director, attended the entire IECC Public Comment Hearing in Las Vegas, and many offered testimony during the Hearing. Finally, the Online Governmental Consensus Vote allowed State Energy Offices to vote on the code change proposals to ensure that energy

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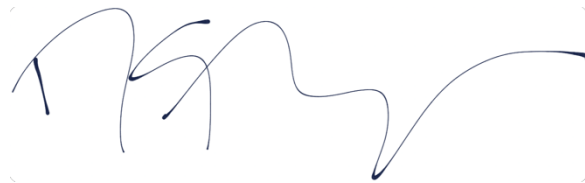
JEFFREY C. GENZER

codes provide the most benefit to the public in their respective states and support state goals. The online voting process is of such importance to NASEO's members that in one case, the Governor of the state stopped by the energy office during the voting meeting held for GMVRs.

Our members appreciate ICC's clear bylaws and deadlines for participation laid out within them. The participating State Energy Offices paid their ICC Governmental Member Fees, validated their voters, and participated within the structure and rules provided by ICC to support development of building codes (including the energy code) that will serve the public interest of all of the citizens of their respective states and not the interests of any one stakeholder group. NASEO's 56 State and Territory Energy Office members represent diverse communities and do not agree on every code change proposal, but all members recognize the importance of building codes. This commitment to effective building codes is illustrated by a resolution passed unanimously by NASEO's Board of Directors in September 2019 that encouraged State Energy Office participation in the ICC process.<sup>1</sup>

NASEO commends the ICC on the commitment to an inclusive process to developing building energy codes, and we look forward to working with you to ensure that building codes continue to support the safety, resilience, and energy efficiency of buildings in the United States.

Respectfully,

A handwritten signature in blue ink, appearing to read 'David Terry', is written over a light blue horizontal line.

David Terry  
Executive Director

CC: Mel Oncu, ICC General Counsel  
Jeff Genzer, NASEO General Counsel  
NASEO Board of Directors

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<sup>1</sup> NASEO Board of Directors Resolution Supporting Energy Efficient Codes  
<https://naseo.org/Data/Sites/1/naseo-codes-resolution-2019-final.pdf>