



February 5, 2024

International Code Council

Appeals Board

Re: International Energy Conservation Code 2024 Appeals

To the ICC Appeals Board,

-profit corporation; we

government level across America to remove barriers to
of EV infrastructure deployment with a particular

We consist of about 50 members that include many
charging infrastructure providers, and related trade
in this proceeding since its inception.

through a rigorous, consensus process that meets
commercial and residential model codes provide standardized
the National Electric Code. Moreover, many of these
body of the code, ensuring that the greatest number of
adoption in full or in part. Importantly, these codes
definitions and requirements, relieving them of
regional patchwork of different requirements. Already
jurisdictions have adopted EV readiness codes, many with
the 2024 IECC EV readiness code provisions will support

However, several appeals put these momentous gains at risk. The American Gas Association, the American Public Gas Association, the Building Owners and Managers Association, the National Multifamily Housing Council, and ICC Region VI, have proposed to overturn many of the 2024 IECC's provisions, including those relating to EV Power Transfer Infrastructure. The appeals largely rely on claims that the EV provisions are in conflict with the scope and intent of the IECC, and that due process was violated during the code development process. In short, the arguments of the appellants are without merit and do not meet the requirements laid out by the International Code Council (ICC) in [redacted] to be considered in the appeals process. The issues related to scope and intent have been decisively determined on several occasions by the ICC consensus committees and ICC staff, following ICC's mandated procedures to develop the 2024 IECC. However the ICC Board is the sole and final arbiter of whether or not these appeals are upheld.

During the 2021 IECC code-making process, many of these same groups appealed the EV readiness provisions on similar grounds. Disappointingly, the ICC Board decided to sustain the appeals at that time. In the aftermath of the 2021 code cycle, the ICC Board released a new energy framework,

[redacted], committing to develop and support the tools needed to achieve the energy priorities of communities and the building industry. This pivotal document revised the scope and intent of the IECC, as well as procedures for the IECC development committees, opening the door for EV readiness to be reintroduced in the 2024 code cycle. Despite this important clarification from the ICC, we are greatly concerned that history will repeat itself, and repeal the approved EV Power Transfer Infrastructure provisions yet again. Failing to adopt EV readiness in this code cycle would set our nation's building stock back by years, leaving it unprepared for the inevitable future of electric vehicles.

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Thank you for your review and consideration of our comments. Please contact me at 252-2912-2912, rick@evtransportationalliance.org if you have any questions about ATE's comments.

Respectfully submitted,

Rick Tempchin, Senior Advisor

Alliance for Transportation Electrification