



February 2, 2024

International Code Council
Appeals Board

Re: International Energy Conservation Code 2024 Appeals

To the ICC Appeals Board,

The Edison Electric Institute (EEI) appreciates the opportunity to submit comments on the appeals that were filed with the International Code Council (ICC) on the final draft of the 2024 version of the International Energy Conservation Code (Residential and Commercial).

EEI is the association that represents all U.S. investor-owned electric companies. EEI's member companies provide electricity for nearly 250 million Americans and operate in all 50 states and the District of Columbia. The electric power industry supports more than 7 million jobs in communities across the United States. EEI's member companies invest more than \$140 billion each year, on average, to make the energy grid smarter, cleaner, more dynamic, more flexible, and more secure; to diversify the nation's energy mix; and to integrate new technologies that benefit both customers and the environment.

EEI's member companies are leading a profound, long-term transformation in how electricity is generated, transmitted, and used. This clean energy transition already has resulted in significant greenhouse gas (GHG) emissions reductions, as the Environmental Protection Agency (EPA) has recognized, and more than 40 percent of our nation's electricity now comes from clean, carbon-free sources.

EEI's member companies are committed to getting the energy they provide as clean as they can as fast as they can, while keeping customer reliability and affordability front and center. Across the industry, electric companies are investing in a broad range of carbon-free technologies and approaches, with the goal of demonstrating these technologies so that they can help further reduce power sector emissions when they satisfy industry performance requirements and are affordable for customers.

EEI strongly supported the revision to the process for updating the 2024 version of the IECC. EEI was honored to be a member of the Commercial Energy Code Committee and one of the subcommittees and one of the working groups. In addition, EEI participated as an interested party with the Residential Energy Code Committee and various subcommittees.

EEI would also like to thank the Appeals Board for having an open process that allows interested parties to provide written and oral testimony on important process questions.

General Comments

I. Scope of Appeals Board Hearing

On the ICC web site, at <https://www.iccsafe.org/products-and-services/i-codes/code-development/2024-iecc-appeals/>, under the section entitled “Purview of the Appeals Board”, there is the following statement:

f Any other subject specific issues

In cases where committee members were not able to vote electronically, procedures were in place to make sure that their votes were counted manually and added to the final vote totals for each proposed code change or amendment.

IV. Discussion of Code Change Proposals

Committee and subcommittee leaders made every effort to include the proponents of every code