



Jason Ketchum

Vice President – Commodity Services

Ph: 918-947-7000

jason.ketchum@onegas.com

Mr. Dominic Sims, Chief Executive Officer
International Code Council (ICC) Board of Directors
International Code Council
500 New Jersey Avenue, N.W.
6th Floor
Washington, D.C. 20001

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Re: Comments of ONE Gas, Inc., in Support of Appeal by American Gas Association of

- “Consideration of Views and Objections” (Section 2.6) in Consensus Committee’s failure to notify public commenters of subcommittee and Consensus Committee outcomes and to attempting to resolve comments. The Section 2.6 process as implemented, required commenters the opportunity to be available and to participate in subcommittee and Consensus Committee meetings. However, this standard approach to consensus processes was not provided consistently during the development of the IECC 2024 Edition which denied commentors the opportunity to register to participate.
- “Evidence of Consensus and Consensus Body Votes” (Section 2.7) was not adequately met through the IECC code development process. Here, again, the IECC process does not address this requirement beyond tallying votes and providing cryptic “reason statements” for Consensus Committee and subcommittee actions.

B. Extra-Procedural Implementation of a “Consensus Building Forum” and Actions of “Omnibus Proposals”

As AGA points out, IECC implemented an *ad hoc* and undocumented extra-procedural approach known as “Consensus Building Forums” for handling of proposals and public comments that was outside the IECC written procedures and limited stakeholder participation.

C. Exceedance of IECC Scope and Intent

As AGA raises, the IECC process has caused the 2024 IECC to go beyond its defined scope and intent to serve energy policy objectives in markets outside of by5dside19.2 (t2dmdb.(s)-1 (i)-2lt (vA(.8b)

Sciences.⁵ The potential for biasing energy choice in favor of wasteful grid electricity uses (specifically for space and water heating), would impose burdens upon builders and consumers in favor of appliances and equipment that would run counter to the Intent of the IECC, Section R101.3. Here, too, all-electric construction has not been shown to be “market-driven” as it increases consumer exposure to monopolistic electric utility energy rates and therefore cannot be characterized as ‘life cycle cost effective’ or showing to improve return on investment. With respect to ONE Gas’s service territorInv01 .cittu[(how)2()-1u101.3.