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International Code Council  
500 New Jersey Avenue, N.W.  
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Washington, D.C. 20001

**Re: *Comment Letter Supporting the International Energy Conservation Code Appeals Filed by the American Public Gas Association***

ICC Appeals Board:

On January 2, 2023, the American Public Gas Association (APGA) filed an appeal of several proposed provisions of the 2024 International Energy Conservation Code (IECC). We are writing to you today in support of As noted in APGA's appeal filing, a number of the proposed provisions fall squarely outside of the IECC's clear scope and intent provisions. Provisions that incorporate additional energy efficiency and greenhouse gas reductions belong squarely in the nonmandatory appendices, if in the code at all, as they neither guarantee increased energy efficiency nor emissions reductions, but do increase the cost of complying with the ever-increasingly complex code.

ICC codes are adopted at all levels of government, so it is important to ensure that ICC's robust development process for the IECC remains fair and transparent. We were disappointed to see that the development of the 2024 IECC did not always meet this high standard that ICC has traditionally held itself to. These violations in due process have resulted many provisions that would hinder the ability for Americans to choose the direct use of natural gas for their homes or businesses, making the code anticompetitive on its face.

Rinnai America Corporation ("Rinnai") respectfully submits his letter in support of the appeals. Rinnai is the U. S. based subsidiary of Rinnai Corporation, Nagoya, Japan, and is part of the over 100-year-old Rinnai Group. Rinnai is the leading gas tankless ("instantaneous") water heater provider in North America.

