

SWTCH comments in OPPOSITION to appeals filed to the 2024 IECC

February 5, 2024

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There is no valid process or procedural issue to appeal on. The only way for the ICC to uphold these appeals would be if it found the entire consensus-based code development process to be fundamentally flawed, in which case the ICC should throw out the whole 2024 draft code and begin the process anew.

Scope and Intent

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. These claims are inaccurate, lack merit, and do not meet the requirements laid out by the ICC in its own ICC Code Development Principles to be considered in the appeals process. The issues related to scope and intent have already been decided on several occasions by the ICC consensus committees and ICC staff, following ICC's mandated procedures to develop the 2024 IECC.

In the aftermath of the 2021 code cycle, the ICC Board released a new energy framework, *Leading the Way to Energy Efficiency: A Path Forward* [e3\(590.1694c\(e3c\(e3c\(e3c\(eus\(t\) -1 \(ai\)-2 nab\(i\) -2 \(l\) -2](#)

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