



**I. The proposed EV infrastructure and electrification provisions are clearly within the scope and intent of IECC.**

During the 2021 IECC appeals process, many of the same appellants contested the proposed EV Power Transfer Infrastructure provisions using the familiar justification that such provisions went beyond the scope and intent of the IECC. In direct response to this issue, the 2019 Group B Appeals Board directed the ICC Board of Directors to investigate expanding the scope of the IECC to include these relevant energy-related goals including decarbonization and electrification. In alignment with this recommendation, the ICC Board amended the IECC's scope and intent, establishing a new framework and decarbonization strategy reflected in *Leading the Way to Energy Efficiency: A Path Forward on Energy and Sustainability to Confront a Changing Climate and Decarbonization of the Built Environment: Solutions from the International Code Council*.<sup>2</sup> This scope change allows for EV infrastructure and electrification-related code provisions that were not considered in the 2021 version to be included in the 2024 IECC. Such changes would not have been made if they did not significantly alter what is permissible within the scope and intent.

Furthermore, ICC Staff issued a memorandum that corroborates this scope modification:  
*scope and intent of the code may be included either in the body of the code as minimum requirements or as an*



Tesla appreciates the opportunity to comment on the 2024 IECC Appeals. We strongly urge the Appeals Board to uphold the outcome of the voting process and maintain the EV Power Transfer Infrastructure provisions in the 2024 IECC.

Sincerely,

Tessa Sanchez  
Senior Policy Advisor

Business Devel  
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