

October X, 2022

Commercial Consensus Committee Members
International Code Council
500 New Jersey Avenue, NW
6th Floor,
Washington, DC 20001

Re: Public Comment Draft #1 for IECC-C

Dear Commercial Consensus Committee Members,

As environmental and climate advocates, we applaud the commercial consensus committee for approving a strong draft of the commercial 2024 IECC. The provisions adopted into the 2024 IECC are critical for achieving the energy and carbon reductions we need to keep temperature rise below 1.5°-degrees Celsius and avoid the worst impacts of climate change. We believe the proposed draft includes many but not all requirements to equitably transition to a carbon free economy and help our nation meet its climate goals. We believe the commercial IECC draft was notably missing requirements to promote efficient electrification where it is cost effective.

For new construction starting in 2025 to be considered “high performance” the requirement to be able to receive electric equipment is paramount. Building electrification and decarbonization policies are widely under consideration to address transitioning away from onsite fossil fuel combustion in buildings as the nation’s electrical grid becomes cleaner and the impact of burning of fossil fuels in our buildings becomes clearer. The energy code needs to encourage the cost-effective electrification of our nation’s buildings in three ways.

First, all new construction mixed fuel buildings should be electric-ready. The cost of meeting electric-ready requirements when the building is being constructed, walls are open, and the trades are already on-site, is small in comparison to the cost of retrofitting a building to install the same level of electric equipment. The cost of retrofitting panels, opening walls to install conduit, etc. can be orders of magnitude higher and act as a barrier for the owner to choose electric appliances at time of replacement or retrofit. Not making high-performance new buildings electric-ready would leave owners exposed to potentially high retrofit costs in the future. This type of requirement is currently a requirement in Title 24 for multifamily buildings .

Second, electrification should be incentivized in the energy code in Section C406. Buildings that burn fossil fuels have higher carbon emissions and increased health and safety risks and therefore should be required to be more efficient than their all-electric counterparts.

Finally, the 2024 IECC should provide model code language requiring all-electric construction in an Appendix. This code language should ensure that electrification reduces carbon emissions equitably by ensuring new buildings minimizes the use of electric resistance heat for space heating. Several cities and states have already passed ordinances banning combustion equipment in buildings

including Washington DC, New York City, Ithaca, New York; Brookline, Massachusetts; Berkeley, Massachusetts; Los Angeles; Sacramento, San Francisco; Oakland and San Jose, California and Washington State. However, not all understand the importance of limiting the use of electric resistance heating to reduce carbon emissions and ensure these requirements aren't increasing energy burden for our most vulnerable community members.

We sincerely applaud the commercial consensus committee for approving a strong draft 2024 IECC and hope the commercial consensus committee considered additional electrification requirements to help our country meet its climate goals equitably. Thank you for your leadership and for the opportunity to comment.

Signed,