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October 26, 2009

Mr. Dale Greiner, Chair, International Energy Code Committee
Mr. Thomas Meyers, Chair, International Residential Code-Building & Energy Code Committee

Dear Mssrs. Greiner and Meyers:

The National Association of State Energy Officials (NASEO) is a membership organization of the nation's 55 state and territory energy offices, which operate numerous residential and other building related energy efficiency programs across the country. Progressively more stringent national energy codes would complement these state-administered energy efficiency programs and set a more solid framework for future program enhancements. NASEO actively supported the efforts of the Energy Efficient Codes Coalition (EECC), a key player in the International Code Council (ICC) hearings, to develop and promote the adoption of a comprehensive proposal to boost the 2009 International Energy Conservation Code (IECC) by 30% over the current IECC, "The 30% Solution 2012".

"The 30% Solution 2012," includes three major ("30Plus"/EC-25, RE-1 and RE-2) and 32 individual proposals, and is focused on:

- **Efficiency Impact** . Achieving more cost effective energy efficiency than any other set of proposals before your Committees, and putting the 2012 IECC well on the path to achieve Congress' looming 50% energy efficiency target.
- **Simplicity**. Helping to facilitate energy code administration and enforcement.
- **Long-Term Benefits**. Recognizing envelope improvements and their associated energy savings that last for decades.
- **A Complete Solution**. Integrating all elements of energy efficiency in a comprehensive manner, rather than dealing with energy efficiency through a piecemeal approach.

EECC specifically drafted "The 30% Solution 2012" to ensure that the IECC will meet both 30% and 50% efficiency improvement targets under serious consideration in both Houses of Congress.

NASEO urges both of your development Committees to take significant, but readily achievable steps, to improve energy efficiency for generations to come by making the following recommendations to the full ICC at the 2009 Codes Forum in Baltimore:

- **Recommend ICC adoption of EECC's comprehensive proposal EC-25, also known as "30Plus."** "30Plus"/EC-25 builds on seven proposals from "The 30% Solution" that received majority support at last year's Final Action Hearings and is independently estimated to boost the energy efficiency of the 2009 IECC by as much as 25% – using readily available technologies that are proven to generate positive cash flow for homeowners. Like DOE's laudable comprehensive proposal, "30Plus," it is drafted for ease in code administration and compliance, however, "30Plus" would attain greater energy efficiency gains.
- **Recommend ICC adoption of RE-1, which would establish the IECC as the ICC's only model building energy efficiency code, or RE-2.** The IECC is the only model code referenced in LEED and extensively cited throughout federal law and legislation currently before Congress. For uniformity and consistency, the nation needs a single energy I-Code; because of its broad-based support, the IECC is the logical choice.
- **Recommend adoption of the 19 individual EECC proposals that are not included in "30Plus" and any additional proposals that will cost-effectively strengthen energy efficiency.**
- **Recommend rejection of those proposals that undo existing efficiency gains or weaken energy efficiency.**

NASEO believes that the 30% Solution will improve the comfort, affordability and efficiency of U.S. homes, and reduce greenhouse gas emissions. On behalf of NASEO, thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read "David Terry". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Terry
NASEO Executive Director