

February 12, 2026

Board of Directors
International Code Council
200 Massachusetts Avenue, NW, Suite 250
Washington, DC 20001

Dear ICC Board Members:

Thank you for the opportunity to provide comments on the International Code Council's (ICC) proposed changes to the 2030 International Energy Conservation Code (IECC) Scope and Intent. The National Association of State Energy Officials (NASEO) is deeply concerned with the bifurcation of the code into the IECC base code and IECC Expanded code (IECCX). The proposed action creates, in effect, two base IECC codes rather than a single consensus code, which will cause confusion rather than enhanced optionality. The main body of the proposed IECCX also excludes several code elements, thereby bypassing the consensus process. Moreover, the proposed scope and intent of the 2030 IECC and IECCX appears to lead to rollbacks from the 2021 and 2024 codes, calling into question the purpose of a two-code approach. Finally, the new simple payback limit seems arbitrary and does not fully consider the energy cost savings homeowners accrue over typical home ownership periods.

In addition to the effects that the proposed approach may have on the quality, energy performance, and homeowner energy costs, the proposed scope and intent will negatively impact states across the country by increasing state and local government code development and adoption costs, confusing stakeholders, and prompting new state legislative actions to clarify state policy. States and local governments are responsible for code adoption and compliance, and they must consider potential impacts on housing, construction, resilience, and affordability – including energy affordability. The proposed changes will spread limited state code expertise and resources across two processes, effectively doubling the burden on states and limiting meaningful state input, absent increased staffing and resources.

In all states, and especially home rule states, smaller local governments often request and receive assistance in assessing the appropriateness of voluntary adoption and implementation of updated codes. States and localities will be left to pay for and resolve ICC's proposed "double-the-work and double-the-cost" approach. Finally, because many states have legislation that specifically addresses the adoption of the IECC, creating two base codes will require development of analyses to respond to legislator questions and to fully inform their legislative decisions (e.g., statute changes) about which, if either, code to pursue.

We encourage ICC's Board to reconsider the proposed change, and we welcome direct and immediate engagement with ICC's leadership to resolve this issue.

Best regards,



David Terry, President NASEO

BOARD OF DIRECTORS

Chair
MOLLY CRIPPS
Tennessee

Vice Chair
WILL TOOR
Colorado

Treasurer
EDDY TREVINO
Texas

Secretary
JULIE STAVELAND
Michigan

Member at Large
KRISTOFOR ANDERSON
Georgia

Past Chair
JOHN WILLIAMS
New York

Parliamentarian
ANDREW MCALLISTER
California

Regional Representatives

DAN BURGESS
Maine

KATIE DYKES
Connecticut

NICK BURGER
Washington, D.C.

NICK PRESERVATI
West Virginia

MITCHELL SIMPSON
Arkansas

KENYA STUMP
Kentucky

JOE PATER
Wisconsin

EMILY WILBUR
Missouri

JANINE BENNER
Oregon

DWAYNE MCCLINTON
Nevada

MARIA EFFERTZ
North Dakota

BEN BROUWER
Montana

President
DAVID TERRY

General Counsel
JEFFREY C. GENZER