

**To:** Goldstein, Benjamin  
**Cc:** Charlie McCrudden; Pranis, Kevin; Carey, Kym; 'Bunch, Saralyn'; Dominic Sims  
**Subject:** Comments on Sections 5 & 7 of Workforce Guidelines for Home Energy Upgrades  
**Attachments:** [Workforce Guideline for Home Energy Upgrades Section 5 and 7](#)

Benjamin-

As promised, ICC has reviewed parts of the Workforce Guidelines for Home Energy Upgrades, Sections 5 & 7, and I have submitted the comments for each section reviewed where we have concerns on the comment pages managed by NREL. (at [http://www.nrel.gov/applying\\_technologies/retrofit\\_review](http://www.nrel.gov/applying_technologies/retrofit_review) ).

These comments were prepared by our technical staff, and due to other workload, we were unable to review the entire 674 page document in the time allowed. For your convenience I have also attached the comments to this email in the simple chart form that our staff used to identify our concerns.

Beyond these comments, we would generally associate ourselves with the technical comments of other industry groups, such as those offered by ACCA, RESNET and ESCO Group.

As you can see from our attached comments, there are numerous instances in Sections 5 and 7, where the Guidelines conflict with, or are inconsistent with existing requirements in the 2009 International Residential Code (IRC) and/or 2009 International Energy Conservation Code (IECC). We also believe that there are numerous inconsistencies and conflicts with code provisions of the IRC and the IECC in other sections of the Workforce Guidelines, beyond those we have identified in Sections 5 and 7.

As I am sure you are aware, the IRC is adopted as law at the state or local level in all 50 states\*, and the IECC or equivalent is adopted as law at the state level by at least 43 states, and at the local level in several more.

Given the widespread application of the IRC and the IECC as mandatory building code requirements, it is critical that the Workforce Guidelines be re-drafted to insure that in any area where they address building elements also addressed by the codes, that the Guidelines are consistent with relevant provisions of the code. It is remarkable that in the entire Guideline document, I could find not a single mention or reference to the IRC or the IECC, given that the coverage of the codes is of the same building elements

covered by the guidelines. This would appear to be a significant oversight by those responsible for drafting the Guidelines.

We appreciate your willingness to accept our comments, and hope that the team ultimately responsible for the drafting of the Guidelines will take the time to compare the Guidelines to all relevant IRC and IECC sections, and insure that the documents are consistent and all conflicts are resolved.

This is especially true since the Building Technology Program of the Energy Efficiency and Renewable Energy Office of the Department of Energy expends significant resources and man-hours to encourage and assist states to comply with the energy efficiency provisions of the 2009 IECC, pursuant to EISA, EPCACT, and other Federal laws.

To have other divisions of the Department of Energy promulgate documents that advocate practices either inconsistent with the 2009 IECC, in conflict with the 2009 IECC, or less stringent than the 2009 IECC would appear to be a counterproductive and wasteful expenditure of federal funds.

Because we work closely with the people in BTP of EERE, I have copied several of our contacts there to make them aware of the discrepancies between the Guidelines and the IRC and IECC requirements that may be of concern to them.

Thanks for your outreach to us, and your willingness to accept our comments. To minimize confusion, and achieve the goals of safety and energy efficiency that are the primary goals of the IRC and IECC, we look forward to working with you to insure that any guidelines issued are consistent with the codes used by the states and local governments that adopt and enforce our codes.

Warm Regards,

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\*Revised on this web page after submittal to 49 states from 50.

\*\*Revised on this web page after submittal to 45 states from at least 43 states.