

September 5, 2013

Docket No. EERE-2013-BT-BC-0036

DOE Activities and Methodology for Assessing Compliance With Building Energy Codes Codes for the facilities that they own or manage. The Department of Defense references the International Building Code for constructing military facilities, including those that house U.S. troops, domestically and abroad.

ICC was established in 1994 as a non-profit organization dedicated to developing a single set of

too many site visits were required, too many

code compliance and higher quality inspections, across all types of building codes. These programs have the added advantage that they are already accepted and embraced by local building code officials and their departments. Further, because both programs have significant advantages to the building departments that utilize them, and the cities, counties and other jurisdictions that operate these departments, the benefits of the programs are ongoing, and participation in the program has a favorable cost-benefit profile for the communities involved. For these reasons, after initial program development and a period of offering early-adoption incentives, both programs are expected to be self-sustaining.

The first program is one called "Get Everyone Certified Challenge." This program is co-sponsored by ICC and the Target Corporation and rewards building departments that get all of their staff certified in at least one category of certification available from ICC for plans examiners, inspectors, special inspectors, permit technician or code official. DOE could participate by adding an incentive for certifying to one of the available energy code certifications, such as residential energy code plans examiner and inspector, or commercial energy inspector. The purpose and goal of this program is to raise the professionalism of all code departments, by making sure every employee is educated and tested to a high level of knowledge of the currently adopted code provisions. This program is expected to lead to better community insurance ratings, in the same way that adoption of current codes is also a factor in community insurance ratings. In addition, communities who have qualified with "Everyone Certified" will be more attractive to land developers and large corporations, an important factor for almost every community's economic development department.If-

If it was desired to have this program focus on Building Energy Codes, during accreditation of Building Departments, IAS would determine which version of the energy code is in effect and if the building department conducts energy inspections or accepts third-party reports. If the department conducts such inspections, the qualifications and procedures used by staff would be reviewed. If third-party inspection reports are accepted, IAS would review the qualifications the department requires of these third-parties, the method for collecting and reviewing reports, and ensure the department is field-monitoring the third-parties periodically.

If DOE desires to work with ICC to enhance the Building Department Accreditation criteria to specifically address Building Energy Code compliance, IAS, the ICC subsidiary tasked with accreditation, could enhance its section on inspections to specifically address building energy code compliance.

ICC continues to stand ready to work with the Department of Energy, in developing a cost-effective, self-sustaining program that will dramatically increase energy code compliance, and leads to high confidence in reported compliance rates.