



June 10, 2022

The Honorable Gary Peters, Chairman
Senate Committee on Homeland Security and Government Affairs
SH-442 Hart Senate Office Building
Washington, DC 20510

The Honorable Rob Portman, Ranking Member
Senate Committee on Homeland Security and Government Affairs
SR-448 Russell Senate Office Building
Washington, DC 20510

Re: Opposition to HR 5673 – STORM Act Technical Corrections Bill

Dear Chairman Peters and Ranking Member Portman:

The Alliance to Save Energy is a bipartisan nonprofit coalition of business, government, environmental, and consumer leaders advocating to advance energy efficiency adoption, and we are a leading voice in informing federal and state energy efficiency policies and standards. We write in opposition to H.R. 5673 due to proposed changes that would weaken and not strengthen the development and implementation of the most recent edition of relevant energy codes.

The proposed changes would reference the two latest editions of the codes versus the most recent, as provided in the STORM Act (42 U.S.C. 5135), and is counter-intuitive to climate urgency and counterproductive to disaster mitigation. If passed, H.R. 5673 would facilitate the adoption of 2018 *and* 2021 IECC energy codes, however for residential buildings, 2021 yields 9.4% more efficiency over 2018, and reduces more emissions by 8.7%.¹ In the context of hazard mitigation, particularly when linked to issues of climate policy, legislation should seek to address the urgency of the day and avoid incentivizing strategies that could cement-in multiple decades of higher emissions.

The Alliance is additionally concerned that H.R. 5673 would reverse the intent of the STORM Act to facilitate “establishing” the latest building codes. The amendment proposes only to facilitate code “implementation,” equaling a substantive and not a technical change. Although facilitating code implementation is essential, equally if not more essential is support to further code adoption. The STORM Act as passed covers both, allowing eligible entities to use grants “to establish *and* carry out the latest published editions” (42 U.S.C. 5135 (f)(5) (emphasis added)).

H.R. 5673 contains other proposed changes that are indeed technical, which should be the limit of the proposed legislation. However, because the bill also contains substantive changes that would frustrate energy efficiency and climate objectives, and in effect weakens the STORM Act, we urge the Committee not to move forward with H.R. 5673 as drafted.

¹ <https://www.iccsafe.org/products-and-services/iecc-on-a-mission-toolkit/>.

We thank you for your continued leadership on energy efficiency and climate issues and look forward to our continued work together to further disaster mitigation through energy policy. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Vincent J. Barnes". The signature is fluid and cursive, with a large initial "V" and a distinct "B" at the end.

Vincent J. Barnes

Senior Vice President, Policy, Research, and Analysis