



**October 25, 2022**

**To:** [Meenal.chauk@dallas.gov](mailto:Meenal.chauk@dallas.gov)

**From:** Todd McAlister, Executive Director, South-central Partnership for Energy Efficiency as a Resource

The South-central Partnership for Energy Efficiency as a Resource (SPEER) is the U.S. Department of Energy recognized Regional Energy Efficiency Organization supporting energy and building code education, adoption and compliance throughout Texas and Oklahoma. Through this work, SPEER facilitates educational trainings and acts as a resource for local governments and the state as they seek to adopt new energy and building codes. In this capacity, SPEER supports the efforts of the City of Dallas to review and consider adoption of the 2021 International Codes.

The review, adoption, and enforcement of updated building and energy codes across the state will enhance efficiency in new buildings, lower energy costs for homeowners, and increase reliability and resiliency to the region's energy grid. As new technologies flow into the region and the state prepares for a more diverse resource mixture to the wholesale electricity market, it is imperative for cities like Dallas to adopt new codes to adequately prepare and receive the added efficiency gains which provide passive survivability and lower bills to the ratepayer.

SPEER supports the findings and recommendations by Cyrus Reed of the Sierra Club Lone Star Chapter. The City of Dallas should reconsider its proposed change of lowering the ceiling R-Value requirement of R42 and leave it as it is written in the 2021 IECC as R49. Also, the City of Dallas should reconsider its proposal of removing the 5 additional energy efficiency measures all together and should keep them in as an available option. SPEER considers both measures would lower the energy efficiency improvements in the code.

SPEER appreciates the opportunity to submit this letter of support for adoption and implementation of the 2021 ICC Codes suite and looks forward to working with the City of Dallas for additional amendments and adoption in the future.

Sincerely,

Todd McAlister  
Executive Director, SPEER