

**BEFORE THE NEVADA ENERGY COMMISSIONER**  
**COMMENT/REPLY COMMENT INFORMATION FORM**

Rulemaking to adopt, amend, or repeal )  
regulations pertaining to Chapter 701 )  
of the Nevada Administrative Code related )  
to the conservation of energy in buildings, )  
including manufactured homes, adoption )  
of 2009 IECC pursuant to Nevada Revised )  
Statutes 701.220. )  
\_\_\_\_\_ )

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RENEWABLE ENERGY AUTHORITY  
CARSON CITY, NV

Please complete the following information and submit this form along with your comments<sup>1</sup>:

Date of Filing: November 3, 2010

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Name of Person Commenting: Donald J. White

Name of Organization (if applicable): Southern Nevada Chapter of ICC,  
Southern Nevada Building Officials

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Do you wish to be placed on the email service list for this matter to receive any further notices? (Mark One)

Yes  No

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<sup>1</sup> Please refrain from making any changes to this form. Thank you.

**Note: Submitted comments are part of the public record for the rulemaking and may be posted on the web.**

**The Southern Nevada Building Officials organization has asked me to weigh in on the proposed state law language for the adoption of the most current energy codes. With regard to the proposed wording, we in southern Nevada would prefer that the 2009 IECC be the referenced code for both residential and commercial aspects of construction. The IECC specifically states, in Section 505.1, that either code, the 2009 IECC or ASHRAE 90.1, 2007 Edition, may be used to comply with energy efficiency requirements. I don't believe that the 90.1 has a reciprocal statement. These codes have always been "sistered" together since the IECC was first introduced into the family of ICC's international codes, and either has always been deemed to comply, though most of us feel that ASHRAE 2007 is actually a slightly weaker code than the 2009 IECC. I realize the way the proposed law language is written, the 2009 being the more restrictive of the two codes, would be acceptable, but, since 90.1 does not specifically contain the 2009 IECC code acceptance statement, this could leave an opening to challenge the legitimate use of the 2009 IECC. Thus, if the law states that, for commercial construction, the 2009 IECC is the code to be complied with, the statement within its code text would specifically permit the design professional to use either code to comply. If you have further questions, please feel free to contact me.**