



Zoe Lees
Vice President of Policy
New Mexico, Texas

790 S Buchanan, 7th floor
Amarillo, TX 79101
zoe.e.lees@xcelenergy.com
Phone: (806) 513-1406

January 2, 2024

Construction Industries Division
Regulation and Licensing Department
5500 San Antonio Drive NE, Suite F
Albuquerque, NM 87109

Attention: Public Comments

I am writing on behalf of Southwestern Public Service Company (SPS) to express our support for the Construction Industry Division's (CID) proposed updates to the 2021 International Energy Conservation Code (IECC). As a utility serving electricity to about 126,000 customers in southeastern New Mexico, we believe New Mexico's adoption of this code with the proposed amendments will support the transition to a clean energy future. The code supports both state and national goals to improve energy codes and to support clean transportation; it also aligns with Xcel Energy's vision to enable 1 of 5 vehicles in our service territories to be electric by 2030 and provide the fueling infrastructure for all the vehicles in the areas we serve to be powered by clean energy by 2050. Importantly, the code was developed through a rigorous process.

Xcel Energy is working across its jurisdictions to offer technical support and expertise in the code implementation process. For example, we are working to develop a Technical Reference Manual for our Texas and New Mexico customers to make it easier for customers to claim savings on energy programs; we offer guidance, resources and support for builders, architects, and code officials through code training and standards programs in Colorado which covers 2021 IECC requirements; and we participate on code development boards. Through this work, we understand the importance of base codes that allow for flexible compliance options and minimize customer costs. Many cities and states nationwide have already updated their energy code to the 2021 IECC and successfully constructed residential and commercial buildings in their communities. When the proposed code and amendments to the state building code are implemented in New Mexico, they will help ensure that new construction projects meet the highest standards of safety and quality, reducing utility expenses for businesses and consumers.

The proposed New Mexico code uses draft 2024 IECC code elements including both electric-ready and Electric Vehicle (EV)-ready infrastructure language for residential and commercial buildings. Both EV-ready and electric-ready requirements were developed through a national, consensus-based process that meets the IECC's scope and intent. The commercial and residential model codes provide standardized code language with definitions consistent with the National Electric Code. Electric-ready requirements allow customers to make their own decisions on which appliances they want in their houses to cook, heat water, or dry clothes, while still meeting efficiency standards. Additionally, the CID electric vehicle amendments are modeled after the pending International Code Council (ICC) energy code requirements.

Installing EV infrastructure is crucial to support New Mexico's recent adoption of the Advanced Clean Car II and Truck Standards by the Environmental Improvement Board. Incorporating vehicle charging infrastructure in new constructions will significantly aid in implementing this new state policy. This code is also critical to support our New Mexico customers, many of whom live or work in areas where public charging is still scarce, by enabling more EV charging in homes or commercial spaces.

Your support for these updates to the building codes is important for facilitating the clean energy transition and creating more electric-ready and EV-ready options for our customers. We appreciate your time and consideration in this matter.

Sincerely,

Zoë E. Lees

Regional Vice President, Planning and Policy
Southwestern Public Service Company