



National Association of  
State Energy Officials

January 22, 2024

The Honorable David Crane  
Under Secretary for Infrastructure  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585

Dear Under Secretary Crane,

The National Association of State Energy Officials (NASEO) requests an extension of the deadline for concept papers for the competitive funding authorized through Section 50131, Assistance for Latest and Zero Building Energy Code Adoption, of the *Inflation Reduction Act* (IRA, Public Law 117-169). State Energy Offices and their local government and private sector partners are leaders in advancing cost effective, resilient, and innovative building energy codes. The substantial number of funding opportunities from the U.S. Department of Energy combined with the release of the Section 50131 competitive funds on December 18, 2023 — just prior to the holidays — and pressure to move key programs such as residential rebates allows only 54 days for states and their partners to respond.

In addition to the extremely limited concept paper submittal window provided, DOE’s proposed deadline has added considerable confusion and complexity for prospective jurisdictional applicants, who face a January 31, 2024, deadline for IRA Section 50131 formula funding letters of intent and a February 29, 2024, deadline for the Federal Emergency Management Agency’s Codes Plus Up effort under the Building Resilient Infrastructure and Communities (BRIC) program, which has a 141-day application window. Most states have BRIC pre-application deadlines, many of which fall in January 2024. In addition, the State Energy Offices are working very hard to braid funding among a variety of programs so that their constituents will benefit to a maximum extent. The building energy codes program fits in this category as the states and their local partners are attempting to connect codes and other activities. Additional time will help the public.

We respectfully request that you extend the application window for concept papers for an additional 90 days to align with other recent IRA and IIJA funding opportunities and ensure interested states have the time and opportunity to submit robust concept papers for this program.

Best regards,

David Terry, President, NASEO

CC: State Energy Directors

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