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Robert H. Courtemanche
President
Personal Insurance

February 20, 2008

Mr. James H. Jorgensen, PE, CBO, Chair
Mr. Stephen J. Turchen, Vice Chair
International Energy Conservation Code (IECC) Development Committee

Dear Mr. Jorgensen, Mr. Turchen, and the IECC Development Committee:

For the important reasons stated below, we are writing to urge the IECC Development Committee to take an ambitious, achievable and affordable step toward improving America's energy efficiency by making the following recommendations to the full ICC at your 2008 Codes Forum in Palm Springs:

Adopt EC-14 /EC-154 known as "The 30% Solution". It is the only proposal before you that is independently shown to achieve an estimated 30% improvement in new home energy efficiency.

Adopt any additional proposals that will strengthen energy efficiency affordably and without compromising safety and structural integrity.

Reject all proposals that weaken energy efficiency.

As one of North America's leading insurers, Allianz recognizes the value of energy efficient homes and buildings. Energy efficient buildings cost less to operate for homeowners and businesses, they have higher property values, they improve comfort for residents, and they reduce the risks of loss and damage. It is not harder to build energy efficient buildings, and the growing trend toward energy efficient buildings may soon relegate buildings not meeting these standards to second-class status.

Allianz/Fireman's Fund has a strong corporate commitment to addressing climate change in our operations and product offerings. We offer several commercial insurance products that provide customers with incentives to make their properties more energy efficient, and we will soon be adding similar products for the residential market – now being introduced in California on a limited basis. Integral to these offerings, is our view that energy minimization has a significant contribution to reducing green house gas emissions.

February 20, 2008

Page 2

Last year we joined 60 leading investors, asset managers and companies in calling on Congress to take strong action on climate change, including realignment of national energy policies. We are aligning our products and our advocacy with improved energy efficiency in buildings because it is one of the most cost-effective measures for reducing greenhouse gas emissions at the scale necessary.

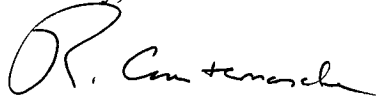
We urge you to listen to the growing chorus of voices from leaders in building and real estate industries, from consumers, and from all levels of government. These voices are calling on America to improve its energy efficiency by 30 percent now and to strive for carbon neutrality in new homes and buildings by 2030.

Last August these voices were joined by the Energy Efficient Codes Coalition (EECC), a broad-based alliance of government, regional energy-efficiency networks, environmental groups, utilities, electricity consumers and businesses. The EECC drafted and submitted EC-14 (and EC-154), a comprehensive package of IECC amendments that comprise "The 30% Solution." The research group ICF International has determined that this package can achieve a 30% improvement in our nation's residential new construction energy efficiency, if fully implemented.

Allianz believes building codes play a critical role in promoting storm-resistant and energy-efficient building materials, as we highlighted in a 2006 joint report with the Worldwide Fund for Nature assessing climate change and U.S. insurers. Improved building codes, complemented by incentive-based insurance policies, are an important part of how our industry can work together with policymakers to help our customers and society respond to climate change and energy challenges.

We respectfully add our support for the "30% Solution" as well as all the individual proposals submitted by the EECC. We strongly urge you to adopt "The 30% Solution" and take any other steps needed to secure an energy efficient America.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Courtemanche". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Robert H. Courtemanche
President, Personal Insurance
Fireman's Fund Insurance Company