

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

State Energy Conservation Office
Building Energy Code Compliance (a division of the Comptroller)
P.O. Box 13528, Capitol Station
Austin, Texas 78711-3528

Re: Pre-Release Courtesy Copy — Energy Code Compliance Findings, City of Chandler, Texas

Dear Public Information Coordinator:

Native Chaos Holdings, an independent transparency initiative publishing independent compliance research, is pleased to provide a courtesy pre-release copy of a Non-Compliance Findings Report concerning the City of Chandler, Texas Code of Ordinances, with particular focus on energy code compliance under Chapter 3 (Building Regulations) and Health & Safety Code §388.003. The research reviews publicly available provisions of the City Code against applicable state law and SECO's energy code jurisdiction.

The findings within SECO's energy code jurisdiction are as follows:

- **CRITICAL** — Article 3.03 (IECC Omission): No division of the City Code adopts the International Energy Conservation Code despite Health & Safety Code §388.003's statewide mandatory minimum energy-code requirement. The City currently has no local enforcement mechanism for a code the state already requires builders to follow.
- **CRITICAL** — §3.03.031 (IBC) and §3.03.091 (IRC): The City has adopted the 2009 International Building Code and 2009 International Residential Code, which are several code cycles behind the current editions. The energy provisions within these codes are correspondingly stale.
- **CRITICAL** — §3.03.291, §3.03.411, §3.03.471, §3.03.521: The 2009 International Plumbing Code, Mechanical Code, Fuel Gas Code, and 1997 National Electrical Code are multiple code cycles behind current editions. The electrical code in particular is approximately 29 years stale as of 2026 — roughly ten code cycles behind the current 2023 NEC.

Findings Routed to TX-SECO

Ordinance	Category	Severity	Description
Art. 3.03 (IECC)	CONFLICT/OMISSION	CRITICAL	No IECC adoption despite HSC §388.003
§3.03.031 (IBC)	OUTDATED	CRITICAL	2009 IBC — multiple cycles behind
§3.03.091 (IRC)	OUTDATED	CRITICAL	2009 IRC — multiple cycles behind
§3.03.291 (NEC)	OUTDATED	CRITICAL	1997 NEC — 10 cycles behind
§3.03.411 (IPC)	OUTDATED	CRITICAL	2009 IPC — multiple cycles behind
§3.03.471 (IMC)	OUTDATED	CRITICAL	2009 IMC — multiple cycles behind
§3.03.521 (IFGC)	OUTDATED	CRITICAL	2009 IFGC — multiple cycles behind

Native Chaos Holdings intends to make the full audit report publicly available no earlier than 30 days from the date of this letter. Native Chaos Holdings respectfully requests the opportunity for any agency technical review of these energy code provisions during this period. Should SECO elect to provide guidance on any of the foregoing findings, Native Chaos Holdings would welcome the opportunity to incorporate that guidance into a supplemental findings annotation before public release. Any inquiries may be directed to Native Chaos Holdings using the contact information set forth above.

Respectfully submitted,

Native Chaos Holdings

Independent Transparency Initiative

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Enclosure: Independent Non-Compliance Findings Report (Full Text)

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APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	State Energy Conservation Office (a division of the Comptroller)
Division	Building Energy Code Compliance
Main Address	111 E. 17th Street, Austin, TX 78774
Main Phone	(512) 463-1931
Public Information	(800) 531-5441, ext. 3-1931
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Website	https://comptroller.texas.gov/programs/seco/
Mailing	P.O. Box 13528, Capitol Station, Austin, TX 78711-3528

Distribution Tracking

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Native Chaos Holdings	Independent research initiative; not affiliated with or representing the City of Chandler, its City Council, or any City official

Reviewer Notes (for Agency Use)

Native Chaos Holdings welcomes written comments and guidance from your office within 30 days of this distribution. Comments may be returned via email to Chandler@NativeChaosHolding.com with subject line including the Distribution Tracking Code above. All feedback will be incorporated into a supplemental findings annotation before public release of the full audit. This packet is provided for informational purposes only and does not represent, coordinate with, or request action by the City of Chandler, Texas, its City Council, or any other City official.

STATUTE CITATION UPDATE (July 10, 2026)

All statutory citations in this letter have been verified against the current text on statutes.capitol.texas.gov. Key precise citations include:

- LGC §54.001(b): General ordinance fine cap is \$500 (Class C misdemeanor per Penal Code §12.23); \$2,000 only for fire safety, zoning, or public health and sanitation (other than dumping or refuse).
- HS §822.042(b): Owner has 15 days to appeal a dangerous-dog determination ("Notwithstanding any other law, including a municipal ordinance"). Destruction order is stayed for 10 calendar days during appeal.
- LGC §229.001(b): Municipality may not regulate possession of a firearm or air gun in a park or public meeting place owned or leased by a political subdivision (including the city itself).
- HS §388.003: Statewide energy code (current IECC edition) is mandatory.
- Tax Code §351.101: Hotel occupancy tax revenue is strictly limited to tourism, convention, and advertising purposes — no unrestricted diversion to the general fund is permitted.
- NRC §81.0523(b)–(c): Railroad Commission has exclusive jurisdiction over oil and gas operations; subsurface well construction, casing, cementing, and pipeline permitting are preempted unless strictly limited to aboveground activity.

These updates strengthen the findings. The full updated report is enclosed.