



AMERICAN COUNCIL OF ENGINEERING COMPANIES
of Connecticut

TESTIMONY BEFORE THE
JOINT COMMITTEE ON ENERGY AND TECHNOLOGY
REGARDING RAISED SENATE BILL 352
March 4, 2014

I am Paul W. Brady, Executive Director of the American Council of Engineering Companies of Connecticut (ACEC/CT), representing over 90 engineering firms providing independent engineering services to the public and private sector.

On behalf of ACEC/CT, I would like to testify in opposition to Raised Senate Bill 352, AN ACT CONCERNING THE STATE BUILDING CODE.

The bill would mandate annual revisions to the State Building Code and require incorporation of revisions to the International Energy Conservation Code or the Home Energy Rating System score recommended by the Commissioner of Energy and Environmental Protection on the rating system established by the Residential Energy Services Network, whichever is more stringent.

We oppose this legislative override of a regulatory process because it does not allow for reasonable accommodation of conflicts with other legislation passed by the General Assembly, changes in the many other national standards included in the State Building Code and unique conditions here in Connecticut. One of the reasons why it takes so long to adopt a revised State Building Code is because of the many conflicting and ambiguous legislative mandates. For example, the bill would require the Code to include one of two very different energy standards "...whichever is more stringent." That is an impossible question to answer.

If you want a more efficient, energy saving Building Code, please stop interfering with the process.

Thank you for your consideration.

Paul W. Brady, Executive Director
American Council of Engineering Companies of Connecticut (ACEC/CT)
pbrady@ctengineers.org