



Testimony
Connecticut Council of Small Towns
Before the Energy Committee
March 4, 2014

- **SB-357, An Act Concerning Energy Efficiency Standards and Product Efficiency Standards**
- **SB-352, An Act Concerning the State Building Code**

The Connecticut Council of Small Towns (COST) *opposes* **Section 1 of SB-357**, which would allow towns to adopt local building codes that differ from the State Building Code.

COST is concerned that this would put pressure on towns to adopt changes to the state code without sufficient input on the implications of such changes on residents, businesses and safety. Small towns may not have the staff or the expertise to appropriately assess the impact of such changes to determine whether to adopt them. It may also create confusion regarding why codes differ from town to town.

The State Building Code is carefully vetted by experts in the industry. Towns have the opportunity to comment on proposed code changes and address concerns with the building officials and lawmakers prior to the code's adoption. This is the appropriate process for determining and adopting state building codes.

Moreover, some towns are exploring opportunities to share building officials to reduce costs. If towns have different codes, this may result in confusion regarding enforcement.

COST also *opposes* **SB-352**, which would impose unnecessary costs on municipalities by circumventing the process for adopting state building codes and mandating the adoption of Model Code IECC 2015.

The adoption of new codes involves numerous costs to municipalities, including training for municipal building officials and changes and updates in information provided to residents and businesses. The current process for adopting building codes ensures that changes and requirements are appropriately vetted by industry experts. Municipal officials and consumers have the opportunity to provide input on proposed changes if concerns arise. The building code is also subject to review and approval by the legislature's Regulations Review Committee, which provides municipalities with another opportunity to ensure that changes are appropriate.

There does not appear to be any legitimate reason why the adoption of the IECC Code should be mandated and circumvent this well-established process.