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TESTIMONY OF ERIC BROWN
CONNECTICUT BUSINESS & INDUSTRY ASSOCIATION
before the
GOVERNMENT ADMINISTRATION & ELECTIONS COMMITTEE

March 3, 2014

Good afternoon. My name is Eric Brown and I serve as associate council and director of energy and environmental policy for the Connecticut Business & Industry Association (CBIA). CBIA represents roughly 10,000 companies throughout Connecticut – both small and large businesses, nearly all of which are subject to state regulations.

CBIA appreciates this committee's continuing efforts to improve Connecticut's regulatory climate by ensuring the regulatory development process is as efficient as possible. We believe three bills on your public hearing agenda today provide opportunities to further that goal. That is why, we offer comment in general support, along with suggested modifications to:

S.B. 272: AN ACT ESTABLISHING A FIXED TIME PERIOD FOR AGENCY REVIEW OF EXISTING REGULATIONS;

H.B. 5049: AN ACT ELIMINATING UNNECESSARY GOVERNMENT REGULATION; and

H.B. 5358: AN ACT AUTHORIZING THE REGULATION REVIEW COMMITTEE TO RECOMMEND THE REPEAL OF OBSOLETE OR BURDENSOME REGULATIONS. (GAE)

Our specific positions and comments on each of these bills are attached.



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**S.B. 272: AN ACT ESTABLISHING A FIXED TIME PERIOD FOR AGENCY REVIEW
OF EXISTING REGULATIONS**

CBIA supports this bill as it calls for a more standardized and clearer process for state agencies to regularly review their portfolio of regulations and report their findings and recommendations to the legislature.

CBIA offers two comments for this committee's consideration in finalizing the bill. First, we believe both state agencies and the regulated community would be well served by including an additional component to the review in subsection 1(b).

Specifically, this additional provision would require agencies to provide, "a list of regulations administered by the agency that provide the greatest compliance challenge for those subject to the regulation, and a summary of actions taken or planned to be taken by the agency to assist those subject to the regulation with achieving greater compliance."

Our second suggested change focuses on subsection 1(c) of the bill with respect to ensuring adequate public notice for the public hearing required under that subsection. Currently, the law requires the public hearing to be held within 30 days of the committee of cognizance receiving a copy of the agency's review from the regulation review committee. We are concerned that this may provide insufficient time for those affected by the regulation to become aware of the review, read it, and prepare meaningful comment. We offer two possible alternatives to address this concern. First, the committee could extend the time period from 30 days to 45 days.

Alternatively, the bill could be modified to utilize the e-regulation system, contemplated in H.B. 5049 which, as we understand it, is already under development. If that system is effectively designed, it could provide an excellent means for notifying affected and interested entities of the activities involving regulations of interest – including the public hearing prescribed in subsection 1(c).

Thank you very much for the opportunity to comment in favor of Raised Bill No. 272. We would welcome the opportunity to work with your committee to make further refinements to the bill.

