



Deputy Commissioner, Brittney Wilson
Vermont Department of Public Service
112 State Street Third Floor
Montpelier, VT, 05620-2601
brittney.wilson@vermont.gov

February 4, 2026

Re: Re-Adoption of 2020 Residential and Commercial Building Energy Standards

Dear Deputy Commissioner Wilson,

AIA Vermont (AIAVT) represents architects practicing across residential and commercial building types throughout the state. Our members are committed to advancing building performance and energy efficiency in Vermont while also ensuring that regulatory standards are clear, stable, and workable across the full lifecycle of a project.

AIAVT supports the Department of Public Service's proposal to re-adopt the 2020 Residential and Commercial Building Energy Standards (RBES and CBES), without amendment, through the current rulemaking process.

We offer this support in the following context:

1. Through no fault of DPS staff, cost-effectiveness data incorporated into the 2024 RBES rulemaking was later found to be significantly inaccurate and was not fully vetted during the adoption process.
2. In August 2025, AIAVT suggested to its members that, pending finalized compliance tools for the 2024 RBES/CBES, projects could be certified under the 2020 standards while continuing to pursue higher-performance design outcomes.
3. In September, Governor Scott directed DPS to allow compliance using either the 2020 or 2024 RBES/CBES while this issue is addressed.
4. DPS is now undertaking formal rulemaking to ensure that this flexibility has a clear and defensible legal foundation.
5. Designers, builders, and municipalities are currently facing real confusion about which standard applies to projects beginning this spring, resulting in delays, disputes with clients, and risk for projects already in design.

Architectural projects extend over long timelines and depend on consistency from early design through permitting and construction. Re-adopting the previously adopted 2020 standards provides necessary continuity for projects already underway and allows design teams to rely on established compliance pathways and documentation.



AIAVT members strongly support Vermont's long-term energy efficiency and climate goals and the continued advancement of building standards. We also believe those standards must be technically sound, cost-effective, and administratively workable in practice.

The forthcoming compliance and cost-effectiveness study will inform future updates to Vermont's energy standards. That process, however, will not conclude in time to resolve the immediate uncertainty facing the design and construction community.

For these reasons, AIAVT supports this limited and temporary action to restore legal clarity and keep projects moving forward while the State completes its analysis and prepares for a robust stakeholder process later this year.

AIAVT appreciates DPS's efforts to provide certainty during this transition and looks forward to continued engagement on longer-term building energy code policy.

Sincerely,

ANDRES GUTIERREZ.

Andres Gutierrez
President, AIA Vermont