

# Sandra Vitzthum, Architect, L.L.C.

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Dear LCAR Committee,

There are three primary reasons I am testifying to re-adopt 2020 CBES in addition to keeping the 2024 CBES valid:

1. **There is no validation software (COMcheck) for the 2024 CBES.** Right now architects are directed to adapt 2020 COMcheck. This is not accurate, involves approximations, and misses some elements. Architects have to certify compliance without a way to prove it, and both their license and their insurance are on the line. AIAVT has advised members to strive to meet 2024 CBES, but to certify to 2020 CBES. (see attached letter)
2. **Some provisions of 2024 CBES are prohibitively expensive,** particularly electrical systems and support for mechanical systems. For example, there is a requirement to shut off some circuits during the night, and that wiring is expensive.

Cost effectiveness is one test for adopting a new energy code. The 2024 CBES cost analysis (submitted to LCAR 5/2/2023) was based on just one 74,000 sf building. From that one building, EFG concluded that the maximum additional cost for commercial and multi-family structures might be \$1.30/sf.

However, three-quarters of American commercial buildings are less than 10,000 sf. Half are less than 5,000 sf. In Vermont these proportions are almost certainly higher. Applying the model to a 5,000 sf building means the 2024 CBES increment would be just \$6,500. It would be almost impossible to meet a fraction of the new requirements for that small amount, not including design.

Most of the architects I know are committed to meeting the 2024 CBES, but ultimately construction costs are up to the owner. We need to have a legal basis for certifying a building when an owner flat out refuses to make disproportionate investment in energy savings measures.

3. **Re-adopting 2020 CBES, without amendments, will reduce confusion.** Our profession is highly trained with significant continuing education requirements. Our profession will not find this arrangement of two valid codes confusing... we are already striving to meet the 2024 CBES but and certifying to 2020 CBES. Re-adopting the 2020 CBES will relieve the legal confusion our profession now faces.

Sincerely yours,



Sandra Vitzthum



August 22, 2025

Dear AIAVT Members,

As Vermont continues its leadership in energy efficiency goals, AIA Vermont encourages all architects to exceed the minimum requirements of the Vermont Residential and Commercial Building Energy Standards (RBES and CBES) wherever feasible. Aiming beyond code is not only a professional responsibility but also a critical contribution to our state's climate objectives. Thanks in part to AIAVT's advocacy, we've seen some forward movement on Vermont Energy Code administration over the past few weeks:

- A [2024 CBES Certificate of Compliance](#) form is now available online.
- Printed 2024 RBES code books and handbooks are now available, distributed by Efficiency Vermont upon request (call the Energy Code Assistance Center at 1-855-887-0673).
- Additionally, a [REScheck \(Total UA\) Compliance Method](#) has been posted, which includes the 2024 RBES.

However, we recognize that the transition to the 2024 RBES and CBES has introduced significant uncertainty. Although the updated codes took effect on July 1, 2024, key resources remain unavailable or incomplete as of mid-August 2025. This uncertainty makes it difficult to certify projects with confidence. The recent changes outlined above are welcomed as movement in the right direction, but we're still waiting on: official electronic versions of both the 2024 CBES and 2024 RBES code books, printed 2024 CBES code books, and updated compliance software for CBES (ComCheck currently supports only the 2020 standard). We also seek basic AHJ administration, like official interpretations and a variance pathway.

In the absence of finalized documents and compliance tools for the 2024 RBES/CBES, AIA Vermont understands that many design professionals may need to rely on 2020 standards for documentation and certification until the updated infrastructure is in place. We encourage practitioners to document their rationale for doing so and to aim for higher performance wherever feasible.

We are aware that this position exists in tension with the statutory requirement under 30 V.S.A. § 51 (RBES) and 30 V.S.A. § 53 (CBES), which mandate compliance with the most current adopted standards. Nonetheless, we are concerned that the ambiguity surrounding the 2024 codes is contributing to a decline in compliance overall. In our view, certifying to the well-established 2020 standards, while continuing to design to higher performance levels wherever possible, is one way of serving the intent of the energy code: to continually improve energy efficiency, comfort, safety, air quality, and overall high-performance buildings across Vermont's built environment.

AIA Vermont stands ready to support our members in navigating this transition with integrity, clarity, and a shared commitment to sustainability. We encourage and welcome member feedback to help us advocate for solutions as we continue to actively communicate with the State and other relevant organizations on your behalf.

Sincerely,

The AIA Vermont Board of Directors