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COMMITTEE, VICE CHAIR



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STATE OF VERMONT
HOUSE OF REPRESENTATIVES

March 25, 2026

Legislative Committee on Administrative Rules
(By email)

RE: Proposed revision of Building Energy Standards rules

Dear Committee:

I am writing to you both in my role as vice-chair of House Energy & Digital Infrastructure and as a result of my efforts over the years to improve compliance with Residential and Commercial Building Energy Standards (RBES and CBES). The latest effort is a bill, H.718, an act related to building energy efficiency, that passed the House today.

The bill was the fruit of three years of off-session committees, as well as other work. In the course of those committees, we heard a great deal of testimony about the bumpy roll-out of 2024 updates to the Standards; concerns the upfront costs and cost-effectiveness of some 2024 updates; and concerns about inconsistent levels of understanding about energy, airflow and moisture control among residential and small contractors.

These problems were the basis for some builders and architects seek the option to use 2020 Standards in lieu of 2024 Standards, as is required currently in statute, an option that was included in the Governor's Executive Order of September 2025.

I am not qualified to opine on the legality of the Executive Order. And it may not be germane to LCAR's work to offer an opinion on policy.

Notwithstanding that, I believe there are better solutions than ratcheting back to 2020 Standards. One is better training for builders; this is the focus of H.718. (H.718 also includes a "hold harmless" section for those who have taken the Governor's E.O. at face value and based compliance on their projects on 2020 Standards, until new rules are approved.). Another is for the Public Service Department to initiate the next round of updates to RBES and CBES, together with the participation of stakeholders — as is standard practice — to address the concerns.

Thank you for the opportunity to comment on the proposed rules.

Sincerely,


Scott Campbell

Cc: Rep. Kathleen James, chair of House Energy & Digital Infrastructure