

March 11, 2026

Rhode Island House Committee on Environment and Natural Resources

RE: NBI Comments Opposing House Bill no. 7738

My name is Tristan Grant, I'm a Rhode Island resident, living in Providence. I'm also representing New Buildings Institute, where I am the Director of Codes and Policy. New Buildings Institute is a National Mission Oriented Non-Profit in the energy efficiency and climate space for 29 years, working to unlock the power of buildings to transform energy systems and improve lives through evidence-based policies and solutions.

We contribute to the transition to a low-carbon built environment by supporting governments and utilities in meeting their clean energy and decarbonization goals through effective building codes and policies. Our approach is rooted in people, and we believe that expanding access to high-performance buildings can solve pressing social challenges by improving public health, strengthening community resilience, and enhancing energy and housing affordability and supporting economic development.

The proposed language in House Bill 7738 places an unnecessary legislative moratorium on the adoption and enforcement of updated energy codes through 2031, prohibiting the state from accessing a key policy tool to advance toward our ambitious climate and energy goals

While some may attest that this reflects a necessary pause for the building industry to “catch up” with the recent update to and adoption of the 2024 IECC, this does a disservice to both the building industry, trades, and prospective homeowners. Many states, including our peers throughout New England and the Northeast, maintain a 3-year code update and adoption cycle. Rather than this being prohibitive or increasing costs, regular code updates contribute to increased familiarity with newer codes and reduce the learning curve associated with skipping forward more than one code cycle. The situation we are in, and many of the adoption and enforcement challenges associated with the 2024 IECC code update are more pronounced because of Rhode Island's history of regressive amendments in previous energy code adoption cycles, which stripped the energy requirements back to the 2009 IECC. This delay in adoption cost Rhode Islanders billions of dollars, and has exacerbated energy burdens throughout the state.

Energy codes are the only codes that must pass a strict cost-effectiveness test throughout their development – meaning that any increases in first costs pay for themselves over the life of the building and its systems, typically several times over. This analysis is reaffirmed by the U.S. Department of Energy for each model code cycle¹. Assertions that energy codes are driving costs present a narrow view of affordability, and delays to energy code adoption come at the expense of future owners and occupants, saddling them with higher energy bills. Energy codes help insulate Rhode Island households from rising costs associated with extreme weather, like the

¹ [Model Energy Code Determinations | Building Energy Codes Program](#)

storms we had this year, and from geopolitical events outside of their control – like the current war in Iran.

Energy codes also save lives and protect vulnerable residents. Research from Pacific Northwest National Laboratory, the National Renewable Energy Laboratory, and Lawrence Berkely National Laboratory, in partnership with the U.S. Department of Energy, have studied and demonstrated how energy codes improve life-safety and reduce excess mortality for building residents during extreme weather and grid-disruption events². Additional research has demonstrated that advanced energy codes significantly reduce criteria pollutant emissions associated with building energy use, contributing to improved public health outcomes and reduced public health costs for adopting states and regions³.

As a concerned constituent and an expert in the energy, climate, and code space, I graciously ask you to oppose this bill placing a moratorium on updates to cost-effective energy codes that will save Rhode Islanders money and increase resilience and life-safety.

Tristan Grant

Director of Codes and Policy

New Buildings Institute

² [Microsoft Word - Efficiency for Building Resilience PNNL#32727 Rev1 230713](#)

³ [Zero-Carbon-New-Construction-Codes-Impacts-on-Criteria-Pollutants-in-New-York.pdf](#)