



April 16, 2026

Honorable Jacob E. Bissaillon
Chairman, Senate Committee on Housing & Municipal Government
Rhode Island State House
Providence, RI 02903

RE: S3032 – Oppose

Dear Chairman Bissaillon:

On behalf of the Rhode Island Business Leaders Alliance (the “Alliance”), I write in opposition to S3032 – An Act Relating to Health and Safety -- State Building Code.

As introduced, S3032 would place Rhode Island’s energy conservation code into a rigid statutory framework tied to the 2024 International Energy Conservation Code (“IECC”), prohibit changes that deviate from that code through January 1, 2031 absent separate legislative approval, and require additional code action regarding electric readiness provisions. Whatever its intent, the bill would create a level of rigidity and uncertainty that risks undermining development, investment, and long-term competitiveness in Rhode Island.

The Alliance’s principal concern is straightforward: S3032 jeopardizes potential projects.

Businesses, developers, institutional users, manufacturers, and property owners considering projects in Rhode Island need a regulatory environment that is modern, flexible, and predictable. Major projects are financed, designed, and phased over long timelines, often in rapidly changing construction, energy, and capital markets.

That matters because building and energy codes do not operate in a vacuum. They shape project costs, system design, equipment choices, financing assumptions, and long-term operational planning. When the state removes the ability of technical bodies to make responsive adjustments and instead requires legislative action for future deviations, it introduces uncertainty into an area where predictability is critical. That uncertainty can delay projects, complicate underwriting and planning, and in some cases cause project sponsors to look elsewhere.

The Alliance is also concerned that S3032 would move Rhode Island away from the kind of innovation-oriented framework that supports emerging building, energy, and infrastructure technologies. As the materials provided to us correctly note, modern energy code development is

increasingly performance-based and designed to create room for evolving technologies and compliance pathways, rather than locking jurisdictions into static assumptions. Freezing Rhode Island's approach through 2031 risks disconnecting the state from national construction, energy, and innovation trends at precisely the time when flexibility is most important.

Just as importantly, Rhode Island should be cautious about becoming an outlier. The IECC functions as the national baseline framework that states typically adopt or adapt, and that alignment helps reduce fragmentation and complexity. Whatever one's view of any particular code provision, a statutory freeze that disconnects Rhode Island from that broader framework risks increasing cost, uncertainty, and complexity for project teams, design professionals, and businesses operating across multiple jurisdictions.

Rhode Island already has a structure that relies on technical expertise and nationally recognized standards through its building code system. S3032 would override that framework and require legislative approval for future technical updates. That approach risks delay, rigidity, and reduced responsiveness to market and technological developments. From a business perspective, that is not a recipe for confidence. It is a recipe for hesitation.

To be clear, the Alliance supports practical, cost-effective energy efficiency measures and supports policies that encourage innovation, resilience, and responsible modernization. This opposition is not about resisting progress. It is about preserving a code framework that can adapt to progress. Rhode Island should not lock itself into an inflexible statutory scheme that may hinder housing production, commercial development, manufacturing investment, and institutional projects over the next several years.

At a time when Rhode Island needs more housing, more economic activity, and more investment, the state should be reducing avoidable regulatory uncertainty, not creating more of it. S3032 risks sending a message that Rhode Island is less nimble, less predictable, and less attractive for future projects. For those reasons, the Alliance respectfully urges the Committee not to move forward with S3032 as currently written and stands ready to work with you and any stakeholders to revise this legislation.

Sincerely,

Gregory Tumolo

Gregory Tumolo, Executive Director
Rhode Island Business Leaders Alliance

CC:

Members of the Senate Committee on Housing & Municipal Government