April 16, 2026

The Honorable Senator Jacob Bissaillon
Chair, Senate Housing and Municipal Government Committee
Rhode Island State House
82 Smith Street
Providence, Rhode Island

Re: Opposition to Senate Bill S3032
AN ACT RELATING TO HEALTH AND SAFETY — STATE BUILDING CODE

Dear Chairman Bissaillon and Members of the Committee:

On behalf of the **Rhode Island Manufacturers Association (RIMA)**, I respectfully submit this testimony in **strong opposition to Senate Bill S3032**, which would establish a moratorium on updates to Rhode Island's energy conservation code beyond the 2024 International Energy Conservation Code (IECC) until January 1, 2031.

Rhode Island has long been a **national leader in addressing climate change while embracing innovation, advanced energy technologies, and resilient systems such as microgrids**. Our progress has been driven not by standing still, but by remaining aligned with evolving national standards and enabling new technologies to emerge and compete.

IECC 2027 is not about forcing a specific energy future—it is about creating a flexible, performance-based framework that allows states, industries, and innovators to deploy the most effective technologies available. Freezing adoption locks Rhode Island out of that innovation ecosystem.

S3032 moves Rhode Island in the opposite direction—replacing leadership with limitation, flexibility with rigidity, and innovation with delay.

I. S3032 Creates a De Facto Freeze on Innovation
While framed as a "pause," S3032 would effectively:

- Override Rhode Island's statutory requirement to align with the latest IECC
- Prevent adoption of the **2027 IECC (expected December 31, 2026)**

- Disconnect Rhode Island from national energy, construction, and innovation trends

Most critically:

S3032 would isolate Rhode Island from a rapidly evolving, performance-based energy ecosystem enabling next-generation technologies across the country.

II. IECC 2027 Reflects a Significantly Improved Development Process

The justification for freezing at 2024 ignores a key fact:

The IECC development process has already been reformed.

- In 2025, the International Code Council (ICC) updated its policies
- Established Council Policy 12C (CP-12C) for ICC standards
- Designed to improve transparency, governance, and stakeholder input

The ICC has stated these changes reflect a:

"commitment to continuous improvement" in direct response to stakeholder feedback (International Code Council, 2025)

Additionally:

- The 2027 IECC development cycle aligns with these improved procedures
- Publication is anticipated by December 31, 2026

Conclusion:
If concerns existed with 2024, the appropriate policy response is to evaluate the improved 2027 code—not prohibit consideration of it entirely.

III. IECC Is the National Baseline—States Do Not Build Codes From Scratch

Across the United States:

- IECC serves as the default national energy code framework
- States overwhelmingly adopt or adapt IECC

Importantly:

- States are not required to adopt immediately
- They can adopt, modify, or delay implementation
- The U.S. Department of Energy requires review and update within two years of a positive determination

Without alignment:

- Local jurisdictions often adopt independently
- Creating a patchwork system that increases cost and complexity

IECC 2027 is designed to reduce fragmentation—not accelerate it.

IV. Broad Technical Opposition: ASHRAE and Industry Leadership

S3032 is not only misaligned with national policy—it is also out of step with the technical community.

- ASHRAE (American Society of Heating, Refrigerating and Air-Conditioning Engineers)—both nationally and within Rhode Island—has expressed vocal opposition to legislation that freezes energy code advancement
- These organizations represent the leading engineers, building scientists, and technical experts responsible for developing the very standards that underpin IECC

Their concern is clear:

A moratorium would make Rhode Island an outlier, disconnected from best practices, modern engineering standards, and evolving building performance frameworks.

V. IECC 2027 Enables Next-Generation Energy Technologies

This is the most critical policy consideration:

IECC 2027 does not mandate technologies—it enables them.

Through performance-based compliance pathways, IECC allows buildings to meet outcomes rather than prescribe systems.

This unlocks innovation across:

Advanced Energy Systems

- Linear generation technologies
- Small modular reactors (micro-nuclear)
- Hybrid distributed energy systems

AI-Enabled Microgrids

- Integrated generation, storage, and load management
- AI-driven optimization for cost, reliability, and emissions

Energy Storage

- Battery, thermal, and hydrogen systems
- Load shifting and resilience improvements

Advanced Building Systems

- Smart HVAC
- Integrated controls
- High-efficiency electrification

Optional Appendices = Innovation Sandbox

IECC structure provides:

- Core baseline requirements
- Optional appendices for advanced adoption

Examples include:

- EV readiness

- Storage readiness
- Renewable integration

States retain full flexibility to:

- Adopt baseline standards only
- Or pursue advanced innovation pathways

VI. Alignment With Emerging Global Standards and Data Frameworks

The building sector is rapidly transitioning toward **data-driven performance standards.**

The proposed **ASHRAE/ICC Standard 240P**:

- Establishes a consistent methodology to quantify:
  - Operational emissions
  - Embodied emissions
- Designed to be referenced by:
  - Codes
  - Public policy
  - Financial and procurement systems

(ASHRAE/ICC, 2025)

This signals a global shift toward:

- Measurable performance
- Transparent data
- Integrated infrastructure planning

A moratorium would isolate Rhode Island from this evolution.

VII. Governance and Structural Concerns

Rhode Island's current framework:

- Relies on the **State Building Code Standards Committee**
- Uses nationally recognized technical standards

S3032 would:

- Override this expert-driven system
- Require legislative approval for technical updates
- Introduce delay, uncertainty, and rigidity

Result:

- Slower adoption of improvements
- Reduced responsiveness to innovation
- Increased regulatory risk

VIII. Strategic Conclusion

IECC 2027 is not simply a code update.

It is a platform for innovation, investment, and long-term competitiveness.

States adopt it because it:

- Aligns with national standards
- Enables access to federal funding
- Supports emerging technologies
- Future-proofs infrastructure

Most importantly:

It creates a neutral framework where all energy technologies can compete—including microgrids, AI systems, advanced generation, and storage.

Final Recommendation

For all of these reasons, S3032 should not move forward.

Rhode Island should instead:

- Maintain alignment with national standards
- Evaluate IECC 2027 upon release

- Preserve flexibility for innovation and economic growth

Key Talking Points

- S3032 freezes Rhode Island at the 2024 IECC until 2031
- The 2027 IECC will be published by December 2026
- ICC reformed the process (CP-12C) to address prior concerns
- IECC is the national baseline—states do not build codes from scratch
- States retain flexibility in adoption timing and approach
- ASHRAE (national + RI) opposes code freezes—would make RI an outlier
- IECC 2027 is performance-based—not technology mandates
- Enables:
    - Microgrids
    - AI optimization
    - Advanced generation (including micro-nuclear)
    - Energy storage systems
- Optional appendices allow flexible adoption pathways
- Standard 240P signals a shift to data-driven building policy
- S3032 replaces expert processes with legislative bottlenecks

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Bottom Line

Freezing the energy code locks Rhode Island out of innovation, national alignment, and long-term competitiveness—at the exact moment when the rest of the country is accelerating forward.

Sincerely,

Melissa Travis

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Rhode Island Manufacturers Association
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