

December 1, 2023

RE: Comments on NYS Building Code Council's Uniform Code and Energy Code Update

Thank you, members of the New York State Fire Prevention and Building Code Council, for holding this hearing today. I am Bria Donohue, Government Affairs Manager at AIA New York. AIA New York represents more than 5,500 architects and design professionals committed to positively impacting the physical and social qualities of New York.

The passage of the All-Electric Buildings Act earlier this year in the fiscal year 2024 New York State budget was a major step forward towards reaching New York's 2050 net zero carbon goals. However, without appropriate implementation into energy codes, these ambitious goals are unachievable if New York fails to address the energy efficiency and energy sources of buildings. In New York, buildings are the largest source of greenhouse gas emissions at 32%. It is critical we electrify appliances and utilize electric heat pumps, heat pump water heaters, induction ovens, and electric dryers to reduce energy unit pollution as well as improve savings for homeowners.

It is important that the Division of Codes and Standards updates the 2024 Building and Energy Code to reflect New York's electrification laws prior to the new proposed building and energy code being filed in the State Register and commencing the SAPA process.

Additionally, AIA New York strongly encourages NYSERDA include additional externalities in their new Cost Effectiveness Methodology. The original proposal did not include calculations regarding the benefits of averted health impacts or decarbonizing disadvantaged communities. It is important that the indirect implications of electrifying buildings are a factor in cost calculations.

As a staunch supporter of the All-Electric Buildings Act, AIA New York strongly encourages the Building Code Council, NYSERDA, and the Department of State full comply with the law to ensure we meet New York's bold decarbonization goals.