

February 11, 2023

Esteemed Chairs Lopes and Gresko,
Members of the Environment Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Senate Bill 979, *An Act Promoting Energy Affordability, Energy Efficiency and Green Cities*.

Section 4 of the bill, which WestCOG **supports**, would enable municipalities to require that new residential or commercial construction comply with the zero energy provisions (Appendixes RC and CC, respectively) of the International Energy Conservation Code (IECC). The IECC is part of a family of codes that is used by many states. These include Connecticut, which most recently adopted the 2021 International Building Code as the basis for its 2022 State Building Code.

It is critical to note that IECC's zero energy provisions do not prescribe any specific building designs or technologies. Rather, they set performance standards that new construction must meet; architects and engineers have flexibility in the choice of designs and technologies they use to meet these standards. Such flexibility is beneficial, as the applicability, efficacy, and cost effectiveness of zero energy designs and technologies may vary by site and building type. For instance, when building in a sunny area one may be able to reach net zero energy through passive solar design (orienting the building to face the sun, with windows concentrated on the south side), coupled with a modest rooftop solar array on the roof; when building in the shadow of a hill, superinsulation may be a more viable strategy. Smart regulation like this is essential for the state to meet greenhouse gas emissions goals, and for its residents and businesses to see real energy cost relief.

WestCOG suggests that your Committee considering enhancing Section 4 in two ways:

1. Work with lenders to **provide energy efficient mortgages** (EEM). An EEM accounts for the savings that result from lower utility bills in an energy-efficient property. In an EEM, the value of these savings is used by a lender to provide more favorable terms to a borrower, such as a higher debt-to-income ratio that enables the borrower to qualify for a larger loan. The larger loan amount can allow a household that would otherwise not be able to afford a net zero home to buy one, and, since net zero homes save more in energy costs than they add in initial costs, reduces the total cost of homeownership over the mid- and long term.

EEMs are not new to the General Assembly. A bill (SB 427) made it to the Connecticut Senate in 2008. WestCOG suggests that your Committee review this bill and best practices regarding EEMs and amend SB 979 to increase the availability and uptake of EEMs.

2. **Allow municipalities to adopt modern standards for water efficiency.** Municipalities in Western Connecticut are running up against limits in drinking water supply and wastewater treatment capacity. Modern water efficiency standards, which would reduce water use and the generation of wastewater, would provide needed relief on both fronts, in addition to

supporting watershed health. Yet, as the table below indicates, Connecticut is tied with New Hampshire for the least efficient standards in the region, and municipalities currently are not enabled to adopt more stringent standards.

| State | Effective Date | Toilet (gpf) | Urinal (gpf) | Public Faucet (gpm) | Lavatory faucet (gpm) | Kitchen Faucet (gpm) | Shower (gpm) |
|---------------|----------------|--------------|--------------|---------------------|-----------------------|----------------------|--------------|
| New York | 26-Jun-23 | 1.28 | 0.50 | 0.50 | 1.20 | 1.80 | 1.80 |
| Maine | 1-Jan-23 | 1.28 | 0.50 | 0.50 | 1.20 | 1.80 | 1.80 |
| Massachusetts | 26-Mar-21 | 1.28 | 0.50 | 0.50 | 1.50 | 1.80 | 2.00 |
| Rhode Island | 25-Feb-21 | 1.28 | 0.50 | 0.50 | 1.50 | 1.80 | 2.00 |
| Vermont | 1-Jul-21 | 1.60 | 0.50 | 0.50 | 1.50 | 1.80 | 2.00 |
| New Hampshire | 1-Jul-22 | 1.60 | 1.00 | 0.50 | 2.20 | 2.20 | 2.50 |
| Connecticut | 1-Oct-22 | 1.60 | 1.00 | 0.50 | 2.20 | 2.20 | 2.50 |

gpm = gallons per minute; gpf = gallons per flush

WestCOG suggests that your Committee expand Section 4 to **allow municipalities to follow the lead of Maine and New York in adopting California efficiency standards for plumbing fittings and fixtures.**

Should you have questions, please do not hesitate to contact me.

Thank you for your consideration.



Francis R. Pickering
Executive Director