

May 19, 2025

Kevin Duerr-Clark & Emma Gonzalez-Laders  
Division of Building Standards & Codes  
NYS Dept. of State  
99 Washington Ave  
Albany, NY 12231-0001  
Emails: [code.development@dos.ny.gov](mailto:code.development@dos.ny.gov) and [energy.code.dev@dos.ny.gov](mailto:energy.code.dev@dos.ny.gov)

Dear Kevin Duerr-Clark, Emma Gonzalez-Laders, and NYS Building Code Council Members,

Sustainable Saratoga is a not-for-profit organization dedicated to promoting sustainable practices and the protection of natural resources through education, advocacy, and action. Our mission focuses on creating a sustainable community that balances environmental protection with a strong local economy. We submit the following comments on the proposed NYS All-Electric Buildings Act (AEBA).

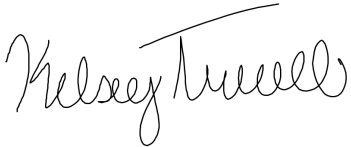
The New York State AEBA supports sustainability goals in several key ways which we encourage the DBS&C to embrace in the AEBA:

- Reducing Greenhouse Gas Emissions
  - Buildings account for 32% of New York's greenhouse gas emissions, so transitioning to all-electric construction helps cut fossil fuel use.
  - The law aligns with New York's Climate Leadership and Community Protection Act, which mandates a 40% reduction in emissions by 2030 and 85% by 2050.
- Improving Air Quality & Public Health
  - Eliminating gas appliances reduces indoor air pollution, lowering risks of asthma and respiratory diseases.
  - Reducing fossil fuel combustion improves outdoor air quality, benefiting communities statewide.
- Encouraging Energy Efficiency
  - Electric heating systems, such as heat pumps, are more efficient than traditional fossil fuel-based heating. The margin of efficiency is typically 3-5 times better which can have a dramatic effect on total energy usage.
  - The law promotes smart energy use, helping buildings integrate with demand-responsive controls to optimize electricity consumption.
- Supporting Renewable Energy Integration
  - All-electric buildings can more easily connect to renewable energy sources, such as solar and wind power.
  - The transition helps decarbonize the grid, making New York's energy infrastructure more sustainable.
- Long-Term Cost Savings & Future-Proofing

- o While upfront costs may be higher, electric systems generally lead to lower energy bills and ultimately have a lower total cost over time.
- o The law ensures new buildings are compatible with evolving electric-based energy infrastructure, preventing costly retrofits later.

Thank you for your consideration.

Sincerely,



Kelsey Trudell  
Executive Director



---

**Board of Directors:** Jeff Altamari (Treasurer), Jeff Buxbaum, Amy Durland (Chair), Carla Fox, Bethany Khan (Vice Chair), Judi Knispel, Sarah Goodwin, Harry Moran, Paul Murphy, Beth Plummer, Richard Romano (Secretary), David Sayer, David Washburn