



**The Maryland Department of the Environment
Secretary Serena McIlwain**

House Bill 1415

***Environment - Building Energy Performance Standards and Energy Use Intensity Targets -
Exemptions***

Position: Oppose
Committee: Environment and Transportation
Date: March 5, 2025
From: Jeremy D. Baker, Director of Government Relations

The Maryland Department of the Environment (MDE) **OPPOSES** HB1415.

Bill Summary

House Bill 1415 would amend the law establishing Maryland's Building Energy Performance Standards (BEPS). The bill would exempt any covered building that received a use and occupancy permit before June 1, 2022, from having to comply with BEPS until the covered building needs to replace lighting, heating, ventilation, and air conditioning (HVAC) systems, or other components due to component failure or as a result of the end of life of those components.

Position Rationale

House Bill 1415 would require MDE to establish a process to track the necessity of replacing systems that goes beyond the Department's existing authority and efforts relating to BEPS. Due to this new exemption, MDE would have to create a covered list of buildings that received a use and occupancy permit before June 1, 2022, and be required to keep track of those buildings' individual lighting and HVAC systems and whether they failed or are close to failure by virtue of being at the end of their useful life. As such, MDE anticipates a high fiscal impact associated with the system tracking and the in-person inspections of over 9,000 covered buildings per existing MDE regulations. Furthermore, MDE's current BEPS legislation, HB 49/ SB 256, would provide flexibility to all buildings, not just the ones constructed before 2022.

MDE respectfully requests the Committee give an **UNFAVORABLE REPORT** to HB 1415.