

PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

ORIGINAL: 2540

June 2, 2006

Mr. John H. Jewett Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

Dear Mr. Jewett:

This letter is in regard to the information you sent us regarding the Final Regulation #4-86 (#2540) which would amend Title 12 of the Pennsylvania Code by deleting Chapter 147. This chapter provides for the administrative procedures and energy conservation standards for the implementation of the Building Energy and Conservation Act (Act 222 of 1980).

We agree that this chapter is unnecessary in that the Pennsylvania Construction Code Act (Act 45 of 1999) repealed Act 222, and that the Uniform Construction Code and the Department of Labor and Industry's standards currently regulate building code guidelines.

We support the deletion of this chapter from the regulation. Thank you again for requesting our input on regulations that comes before you.

Sincerely,

Elam M. Herr

Assistant Executive Director

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cc:

Mr. Matthew Speicher, Assistant Chief Counsel Department of Community and Economic Development