



Bill: SB 175/HB 222- Public Safety - Corrugated Stainless Steel Tubing for Fuel Gas Piping Systems - Requirements and Prohibitions

Position: OPPOSE

Dear Chair, Vice-Chair, and Members of the Committee:

The Maryland Coalition for Inclusive Energy Solutions (MCIES) a coalition of corporations, associations, and labor organizations advocating for the inclusivity of all energy types, including natural gas, renewable natural gas, hydrogen, propane, and nuclear power, write to express our opposition to SB 175/HB 222.

While we fully support efforts to enhance safety, this bill is founded on a flawed premise and presents significant concerns that we strongly encourage the General Assembly to consider.

It is our understanding that LC-1027 is not a national consensus standard. LC-1027 is a customized testing criterion created by a single manufacturer for its specific product and is not a recognized standard developed by any standards development organization. Contrary to the bill's language, LC-1027 is not referenced in the International Fuel and Gas Code or the Maryland Plumbing Code.

The LC-1027 criteria has also been reviewed and explicitly rejected by respected national organizations, including the National Fire Protection Association and The CSA Group, a leading standards-setting organization for North America.

Adoption of this bill would effectively establish a monopoly for one patented product. The LC-1027 standard was developed for a single, unique product and is not intended or suitable for industry-wide application. Restricting the sale and use of CSST to a single standard is likely to significantly increase costs for builders, contractors, and consumers.

For these reasons, we respectfully request an unfavorable vote. Should you have any questions, please feel free to contact me at speters@hbstrategies.us.

Sincerely,

Sarah Peters
Executive Director