

**From:** Brian Cowan <briancowan3@gmail.com>  
**Sent:** Thursday, September 26, 2019 8:17 AM  
**To:** DES SBCC <sbcc@des.wa.gov>  
**Subject:** 2018 Washington State energy code comment

Doug Orth, Chair  
State Building Code Council  
1500 Jefferson St SE  
Olympia, WA 98501

Dear Chair Orth and the Washington State Building Code Council:

I would like to offer our support for the proposed 2018 Washington State Residential Energy Code. We work on single family residences doing new construction and major renovations. Every day we see opportunities to improve efficiency in buildings that we are remodeling and although we try to build to the highest standard of efficiency and durability, the construction industry could use this lift to improve buildings as a means of fighting Climate Change.

buildings in Washington are an essential part of the meeting our clean energy future, and one of the most effective ways to ensure that our buildings are as efficient as possible is through strong and innovative energy codes. Washington has a legislative mandate for new buildings to be 70% more efficient by 2031 than they were in 2006. The proposed 2018 Washington State Residential Energy Code keeps the state and its new residential construction on a path to reach that goal. In addition, more efficient buildings are more comfortable for tenants, add features to homes that add to their value, and save hundreds of dollars in utility bills for residents. **We support the proposed revisions to the Residential Energy Code, and we urge the Council to approve this code.**

We would like to highlight particular support for the following changes:

- **Account for Carbon in Option Table:** This proposal is an important step toward decarbonizing residential new construction in Washington state; as electricity becomes cleaner, the option table credits for high efficiency electric measures will increase. *(Proposal 36)*
- **Passive House Alternative Compliance:** This proposal adds passive house certification (PHIUS and PHI) as an alternative performance-based compliance path for homes, which provides for continued flexibility in meeting the energy code requirements. *(Proposal 32)*
- **Water Heater and Dryer Electric Readiness:** This proposal allows homes to have easier and cheaper electrification upgrades in the future by requiring electric receptacles near gas and propane water heaters and dryers, reserved space in the electrical panel, and extra space for all water heaters, to allow for future heat pump water heater replacements. This is a common sense proposal that will prevent expensive electrical retrofits in the future. *(Proposal 33)*
- **Optional “Reach Code”:** This proposal provides two optional “reach code” appendices. Providing these appendices will allow jurisdictions and/or utilities to incentivize efficient residential construction above code in a consistent way. *(Proposal 35)*

Sincerely,

Brian Cowan