



September 27, 2019

**Washington State Building Code Council
1500 Jefferson Street Southeast
Olympia, WA, 98501**

Re: Climate Solutions comments in support of the proposed 2018 Washington State Residential Energy Code

Dear Chair Orth and the Washington State Building Code Council:

Climate Solutions thanks you for the opportunity to submit comments in support of the proposed 2018 Washington State Residential Energy Code. Climate Solutions is a clean energy nonprofit organization working to accelerate practical and profitable solutions to global warming by galvanizing leadership, growing investment, and bridging divides. The Northwest has emerged as a center of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub. For 20 years, we have cultivated political leadership in the Northwest under the proposition that clean energy and broadly-shared economic prosperity go hand-in-hand, building a powerful constituency for local, regional, and national action on climate and clean energy.

Buildings currently represent 27% of our greenhouse gas emissions, and one of the key ways to ensure that our buildings are as clean, efficient, and protect the future of Washingtonians is through strong energy codes. Climate Solutions strongly supports proposed revisions to the Residential Energy Code and urges the Council to approve the package of changes. There is significantly more work to be done to ensure all Washingtonians have access clean and efficient homes. The proposed 2018 Residential Energy Code sets us on a pathway to net zero-ready construction by 2031, as required by statute, and a cleaner residential building sector. These changes will help protect the public health of our residents, make homes more efficient and comfortable, support a robust economy, and ensure we have a stable climate. The package includes critical changes to acknowledge the impacts of using gas, a fossil fuel, in homes, and provides a mechanism to begin transitioning to cleaner homes.

In particular, Climate Solutions strongly supports the following changes:

- ***Accounting for Carbon in the Option Table:*** Accounting for carbon in the option table is an important first step toward incentivizing efficient and clean new residential construction. With the state's electricity now on a pathway to 100% carbon-free, it is important that carbon is factored into residential construction decisions.
- ***Electric Readiness:*** The electric readiness change provides an option for homes to more cost-effectively upgrade to electric water heaters and dryers. This proposal would require



that homes have electric receptacles near non-electric water heaters and dryers, reserved space in the electrical panel, and extra space to allow for future heat pump water heater replacements. We see this as a logical proposal that helps prevent expensive electrical retrofits in the future.

- **Optional Reach Code:** The optional reach code proposed change provides two optional reach code appendices that will allow local jurisdictions or utilities to incentivize more efficient residential construction above code. We support local jurisdictions having the choice to go beyond the code requirements in order to meet local needs and policy objectives.

Thank you again for providing the opportunity to submit comments in support of the 2018 Washington State Residential Energy Code package. The changes highlighted in our comments are important for protecting public health and making our homes cleaner and more efficient. We look forward to engaging with you as the process moves forward.

Sincerely,

A handwritten signature in black ink that reads "Kelly Hall". The signature is written in a cursive, flowing style.

Kelly Hall
Washington Policy Manager
Climate Solutions