

To: Washington State Building Code Council

From: Gary Heikkinen, PE-NW Natural
Energy Code TAG Member

Date: September 25, 2019

Subj: Proposal WSEC-R33 Electric Readiness

This proposal would require the installation of dedicated electric receptacles within 3 feet from each gas or propane water heater or dryer. It would also require an indoor space at least 3 feet by 3 feet by 7 feet high within 3 feet of the water heater.

The Council should disapprove this proposal for the following reasons:

1. This only adds cost to construction and results in zero energy savings. It therefore fails the cost-effectiveness test. The mandated electrical may vastly exceed the needs of a replacement appliance 15-20 years from now or even be insufficient to the requirement. Setting the requirement based on current electric appliances is driving a fairly significant cost that provides no savings and may not be well suited to future demands.
2. The water heater requirement is clearly written with a heat pump water heater in mind, but fails to consider the most critical resource the appliance needs for efficient function - adequate air supply. Most units use air as the heat exchange medium to draw from, but can deplete the exchange medium if there isn't a large volume of air or an air source that is regularly refreshed. The proposal does nothing to ensure adequate air flow is available for the heat pump function and represents the fundamental flaws present in it that justify its rejection.
3. This same proposal was recently disapproved at IECC committee hearings for the 2021 code.
4. One stated purpose for the change is that it would enhance customer choice and yet there is no reciprocal requirement for a dedicated gas outlet next to electric equipment or appliances.
5. The TAG was evenly split on this proposal with a vote by the Chair needed to break the tie. Final vote was 7-6 with 2 abstentions for approval. There was not a strong consensus to approve it.
6. The cost of constructing new homes will already be going up because of all the other changes to the code. The added cost from this proposal is unnecessary and unwarranted.

Please don't hesitate to contact me if you have any questions.