

VIA ELECTRONIC MAIL

Doug Orth
Council Chair
Washington State Building Code Council
1500 Jefferson St SE
Olympia, WA 98504
SBCC@des.wa.gov

September 27, 2019

RECA Comments Supporting Adoption of the 2018 Washington State Energy Code based on the 2018 International Energy Conservation Code for Residential Construction in Washington

Dear Mr. Orth:

The Responsible Energy Codes Alliance¹ appreciates the opportunity to comment on Washington's proposed adoption of the 2018 *Washington State Energy Code* (WSEC) based on the 2018 *International Energy Conservation Code* (IECC) for residential construction as outlined in the *Original Notice of Proposed Rulemaking*, published August 6, 2019, in the Washington State Register.² RECA has participated in previous energy code update processes in the state, and we support the Council's efforts to improve efficiency and the overall quality of homes in Washington. **We support the Building Code Council's proposed update to the residential provisions of the 2018 WSEC based on the 2018 IECC.**

We acknowledge that the state has historically used the IECC as a starting point for its residential energy code, and then adopted amendments, most of which improve energy efficiency and carbon-reduction. Although we support and promote the adoption of the 2018 *IECC* with no weakening amendments as the best way to for a state to ensure that homeowners receive all the energy and cost-saving benefits of the nation's latest model energy code, we recognize that Washington has historically taken a different direction on

¹ RECA is a broad coalition of product and equipment manufacturers, trade associations, building science experts, and energy efficiency advocates that promote the adoption of the latest model energy codes in every state. A list of our members can be found on our website, www.reca-codes.com.

² Original Notice, Washington State Register, Issue 19-16 at 137, *available at* <http://lawfilesexst.leg.wa.gov/law/wsr/2019/16/19-16PROP.pdf>.

certain issues and has maintained this direction in the proposed 2018 version. Nonetheless, we support this update because the proposed revisions to the current WSEC will, for the most part, incorporate improvements from the 2018 IECC consistent with the approach in past code revisions and thereby improve upon the current WSEC.³

The energy and cost savings of the 2018 *IECC* for residential buildings are well-documented⁴, and adopting a code based on the 2018 IECC will help keep Washington on track with its statewide energy efficiency goals. Under RCW 19-.27A.020(2)(a), “[t]he Washington state energy code shall be designed to construct increasingly energy efficient homes and buildings that help achieve the broader goal of building zero fossil-fuel greenhouse gas emission homes and buildings by the year 2031.” Washington has made significant progress toward its energy conservation goals the last few energy code update cycles. In addition, RCW 19.27A.160 requires the council to “adopt state energy codes . . . that incrementally move towards achieving [a] seventy percent reduction in annual net energy consumption” using the adopted 2006 Washington state energy code as a baseline. Adopting the 2018 WSEC for residential construction is the logical next step for Washington’s building energy codes and will bring Washington closer to its demand-reduction and energy-saving goals.

Conclusion

RECA supports the adoption of the 2018 WSEC for residential buildings as an improvement over the current code, and we offer our experience in energy code adoption and implementation as the Council moves to maximize energy efficiency. Please contact me at (202) 339-6366 or eric@reca-codes.com if you have any questions or would like to discuss how RECA can be of assistance.

Sincerely,

Eric Lacey

RECA Chairman

³Our support for the 2018 update should not be viewed as support for every provision incorporated in the code, but rather support for the overall improvement over the current code.

⁴ See, e.g., U.S. Dep’t of Energy, *Preliminary Analysis Regarding Energy Efficiency Improvements in the 2018 International Energy Conservation Code (IECC)*, 84 Fed. Reg. 1883 (May 2, 2019); Z.T. Taylor, *Preliminary Energy Costs and Savings Estimates: 2018 IECC Residential Requirements* (April 2019); and U.S. Dep’t of Energy, *Preliminary Energy Savings Analysis: 2018 IECC Residential Requirements* (May 2019).

RECA is a broad coalition of energy efficiency professionals, regional organizations, product and equipment manufacturers, trade associations, and environmental organizations with expertise in the adoption, implementation and enforcement of building energy codes nationwide. RECA is dedicated to improving the energy efficiency of homes throughout the U.S. through greater use of energy efficient practices and building products. It is administered by the Alliance to Save Energy, a non-profit coalition of business, government, environmental and consumer leaders that supports energy efficiency as a cost-effective energy resource under existing market conditions and advocates energy-efficiency policies that minimize costs to society and individual consumers. Below is a list of RECA Members that endorse these comments.

Air Barrier Association of America

Alliance to Save Energy

American Chemistry Council

American Council for an Energy-Efficient Economy

Energy Efficient Codes Coalition

EPS Industry Alliance

Extruded Polystyrene Foam Association

Institute for Market Transformation

Johns Manville Corporation

Knauf Insulation

National Fenestration Rating Council

Natural Resources Defense Council

North American Insulation Manufacturers Association

Polyisocyanurate Insulation Manufacturers Association