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July 12, 2018

Thank you for the opportunity to comment on the commercial energy code today. The following summarizes the oral testimony I provided.

I want to encourage the council to stay the course and adopt, with very few amendments, the code changes published in the Commercial Washington State Energy Code CR102 dated May 16, 2019. This will provide the best efficiency outcome and contribute to the incremental savings required by statute. You won't overshoot the incremental targets by doing this.

I appreciate the public comment that provides editorial corrections and clarifications. The council should proceed with these corrections. There are a number of public comments that will weaken the energy savings placing the council behind on achieving the efficiency targets. These should be avoided.

I want to remind the council that I submitted a discussion paper on the topic of the carbon emissions factors selected to implement the total system performance factor and the total systems performance method. In that paper I provide a comparison of several studies estimating marginal electric generation factors, then I recommend use of 0.70 lb. kWh for electricity.<sup>1</sup> This was selected by the council to be included in the CR102. Since last fall the Washington State legislature passed the Clean Energy Transformation Act (CETA) which will assure this value or lower. CETA requires that utilities eliminate coal as a generating resource by 2025. By 2030, utilities must provide net-zero carbon emissions electricity, offsetting any carbon emitting generation with renewable energy offsets. In 2024 every utility in the state must provide electricity free of carbon emissions.

The biggest unfinished business that moved into the CR102 is the lighting power allowance tables. I recommend the council adopt option 4 included in the comments submitted by Mike Kennedy.<sup>2</sup> There should be no categories where the lighting power allowance exceeds the existing code. Also, limit adoption of any additional lighting power allowances or keep the application very narrow in focus.

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1. [Chuck Murray](#), Carbon emissions/electric (050/101/141)
2. [Mike Kennedy](#), C405 Lighting table (EL119/121)

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