



July 12, 2019

Washington State Building Code Council

Via email: richard.brown@des.wa.gov; krista.braaksma@des.wa.gov; doug.orth@des.wa.gov

Council Members,

On behalf of the Northwest Energy Efficiency Council (NEEC), I respectfully submit these comments on the proposed changes to the Washington State Energy Code. NEEC is a non-profit business association representing over one hundred businesses that provide energy efficiency products and services in Washington State. NEEC owns and administers the Building Operator Certification program, a training program implemented throughout the US and in Canada that trains facility staff on the efficient operation of a commercial building. We also provide support to the City of Seattle's commercial buildings energy benchmarking program and Tune-Up Accelerator project and manage the Smart Buildings Center where we loan tools to commercial building owners and managers and host trainings on many topics including the Washington State Energy Code. Here we will provide comment on those sections of the code that most relate to the community we support.

NEEC is supportive of the proposed changes and applauds the hard work of the council to develop a state energy code that will support the construction of highly efficient commercial buildings. We urge the Council to approve this code. Though there is much more required to ensure that all Washingtonians have access to the most efficient buildings possible, the proposed 2018 commercial energy code sets us in a good direction.

We are particularly pleased to see progress in the following areas:

- Strengthening the air barrier test standard to limit energy loss through envelope weaknesses.
- Providing design flexibility of HVAC systems while constraining the installation of poor performing systems.
- Providing direction on solar-ready roofs. This is a commonsense change to make to the code for new buildings better able to accommodate solar when it makes sense; with the recent passage of SB 5116, readying buildings to support a cleaner grid is paramount.
- Adopting ASHRAE Appendix G to switch the metric from site energy use to carbon emissions, which will become increasingly important as our electricity grid becomes cleaner. We recommend that the value of 0.55 pounds of carbon dioxide equivalent per kilowatt-hour be used as the carbon metric, as was proposed by the Technical Advisory Group.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry Meade".

Kerry Meade
Executive Director,
Northwest Energy Efficiency Council

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