



9/26/19

Mr. Doug Orth, Chair
State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Dear Chair Orth and the Washington State Building Code Council:

RE: Support for Residential Energy Code

Dear Chair Orth and the Washington State Building Code Council:

Efficient buildings in Washington are an essential part of meeting our clean energy future and our carbon emission reduction goals. One of the most effective ways to ensure that our buildings are as efficient and climate friendly as possible is through strong and innovative energy codes. Washington has a legislative mandate for new buildings to be 70% more efficient by 2031 than they were in 2006. The proposed 2018 Washington State Residential Energy Code keeps the state on the right path to reach that goal. This is especially important given that local jurisdictions do not have the authority to set more progressive residential energy codes.

We support new homes that provide the most value to homeowners and tenants, including comfort, better indoor air-quality, energy and water utility cost savings, with the least impact to our climate and environment. **The City of Seattle supports the proposed revisions to the Residential Energy Code, and we urge the Council to approve this code.** We would like to highlight particular support for the following:

- **Add and Require Additional Credits in Option Table (Proposals 23 and 31):** The full set of proposals to increase the credits will increase the efficiency of the residential energy code by approximately 22% in medium and large homes--the size of the majority of homes built in Washington. The option table also continues to preserve flexibility for homebuilders to meet the requirements of the code--they can choose what options make most sense for the home and owner. This proposal is responsive to the legislative mandate to reduce energy use in new construction 70% by 2031 and to Executive Order 14-04 to accelerate innovation and achievement toward this mandate. The proposals also make important clarifications and structural improvements to the option table to make it easier to understand.
- **Account for Carbon in Option Table (Proposal 36):** This proposal is an important step toward decarbonizing residential new construction in Washington state. Seattle City Light, Seattle's municipal electric utility, provides clean, carbon neutral electricity to Seattle and other

jurisdictions including Burien, Lake Forest Park, and Shoreline. We urge the Council to stay with the lower carbon emissions factor of .71lb CO₂e/kWh that was already approved by the SBCC – and would expect that this number would decrease over time to reflect a cleaner evolving grid as a result of the passage of the Clean Energy Transformation Act. This proposal which accounts for carbon is also consistent with the goals set forth in RCW 19.27A.020 which states: “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**”

- **Water Heater and Dryer Electric Readiness (Proposal 33):** This proposal allows homes to have easier and less costly electrification upgrades in the future by requiring electric receptacles near gas and propane water heaters and dryers, reserved space in the electrical panel, and extra space for all water heaters, to allow for future heat pump water heater replacements. This is a commonsense proposal that will prevent expensive electrical retrofits in the future.
- **Optional “Reach Code” (Proposal 35):** This proposal provides two optional “reach code” appendices. Providing these appendices will support the City of Seattle’s and Seattle City Light’s incentive programs to promote efficient residential construction above code in a consistent way.

Sincerely,



Jessica Finn Coven
Director, Office of Sustainability and Environment