



Solar Installers of Washington

July 12, 2019

STATE BUILDING CODE COUNCIL

Doug Orth, Chair

1500 Jefferson Street SE

PO Box 41449

Olympia, Washington 98504

re: Comments on the 2018 WSEC-Commercial

Dear Chair Orth and Council Members,

Solar Installers of Washington represents installers and suppliers of solar energy systems is pleased to see proposed changes that we hope will advance the inclusion of renewable energy generation in the built environment. We would like to submit the following comments to the Council:

C406.1 - The move to a system of credits helps to identify the relative effectiveness of the options. We don't know if this will increase the use of onsite renewable energy versus the previous method of choosing options, but the mid-range value given to onsite renewables doesn't appear to be a hindrance to its adoption.

C409 - The requirement for metering production of solar on commercial buildings for the Renewable Energy Cost Recovery Program has created some difficulties for solar installers, and we were concerned that the solar metering requirement added to C409 would do the same, but upon reading the whole code section it became apparent that this will add no burden to solar installers.

C411 - We think that the adoption of solar readiness is important; too many commercial buildings have roofs that are full of obstacles to solar energy production, so we are definitely in favor of the solar-ready roof. It is our hope that builders will take compliance with this rule seriously and will not allow equipment and other things to creep into this area during construction, something that we have observed at some projects in Seattle.

Appendix E - SIW supports making this mandatory statewide. The requirement is small, but we have seen in Seattle that the adoption of this has advanced the familiarity with solar among engineers, architects, builders and developers.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Jeremy Smithson', written in a cursive style.

Jeremy Smithson

Policy Committee Co-chair