

July 12, 2019

Chair Orth and Members of the State Building Code Council:

As the Public representative on the Energy Code TAG, I would like to offer the NW Energy Coalition's support for the recommended changes to the commercial portion of the Washington State Energy Code (WSEC-C) and urge the State Building Code Council to approve them.

The NW Energy Coalition is an alliance of approximately 100 environmental, civic, and human service organizations, progressive utilities, and businesses working for clean and affordable energy. For nearly 40 years, we have advocated for energy efficiency as the cheapest, cleanest, and most abundant source of energy to meet our region's demand for energy and capacity. Thanks to investments made in electric energy efficiency since 1978, the region has saved 6,600 average megawatts—half the region's growth for demand in electricity, and enough to power five Seattle-sized cities.¹

Building energy codes are a key piece of ensuring that we are meeting our energy and capacity needs with energy efficiency, and with the benefit of saving residents money on their utility bills. Many of the measures that make our buildings the most efficient—namely HVAC and envelope measures—help save energy when our energy system needs it the most—namely, on cold days in winter when our hydroelectric resources are low and natural gas prices can be more volatile. As we move forward toward a cleaner grid, it will become even more critical to deploy strategies that make the best use of our energy.

The Energy Code TAG and other stakeholders have put forward considerable effort to make improvements and clarifications to the WSEC-C. Though the energy savings are relatively modest for this update, the structural changes are important for keeping us on a path to meeting the State's 2031 legislative targets for new construction.²

Below are two specific comments on the proposed code:

- **Lighting power allowance (LPA):** Three proposals were advance for public comment. There is another option for LPAs that have gone through the ASHRAE and IECC process and had extensive vetting. We recommend that the SBCC adopt these national-level LPAs.
- **Carbon metric:** There was much debate at the Energy Code TAG and at the SBCC on what value should be used for the carbon metric used in some sections of the proposed code (specifically Proposals 50 and 141). The passage of SB 5116 in the Washington State legislature this past spring will bring coal-fired generation out of Washington electric rates by 2025; have electric utilities be greenhouse gas emissions neutral by 2030; and, by 2045, electric utilities will be 100% greenhouse gas emissions free. This law will make our electric grid cleaner even faster than anticipated before the proposed code went out for public comment.

Thank you for the consideration.

Best Regards,

Amy Wheelless
Policy Associate

¹ <https://www.nwcouncil.org/energy/energy-topics/energy-efficiency>

² RCW 19.27A.160 <https://app.leg.wa.gov/RCW/default.aspx?cite=19.27A.160>