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 proposed changes to the residential portion of the Washington State Energy Code (WSEC-R). We urge the State Building Code Council to adopt a package that prioritizes and promotes strong energy efficiency measures and keeps us on a path toward net zero energy homes by 2031.¹

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 more than 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.²

Building energy codes are a key piece of ensuring that we are meeting our energy and capacity needs with energy efficiency, coincident with the benefit of saving residents money on their utility bills, living in more comfortable and resilient homes, and reducing greenhouse gas emissions. **As we move forward toward a cleaner electricity grid, it will become even more critical to deploy strategies that make the best use of our energy, and strong building energy codes are key to that transformation. Building it right now is essential.**

The proposed WSEC-R code keeps us on an incremental path to meet the State’s 2031 legislative targets for new construction in a way that is practical, cost-effective, and readily achievable.


² [https://www.nwcouncil.org/energy/energy-topics/energy-efficiency](https://www.nwcouncil.org/energy/energy-topics/energy-efficiency)
The Coalition would like to particularly offer our support for the proposed changes to the option table. The option table is a unique feature of our code that allows builders to meet our efficiency needs in a flexible way. The changes to the option table add additional options, provide clarity and structural improvements, and add more credits requirements that depend on the size of the home. There are a few editorial and technical corrections needed to the CR 102, but these changes should be minimal and will not add costs; please see the comment submitted by the Department of Commerce for more information. Analysis of the proposed code with these corrections shows that meeting these additional credit requirements will be cost-effective for a resident, resulting in lower energy bills and a more comfortable home, and keeping Washington at the forefront of innovation.

Let’s build our homes as efficiently as we can now – they’ll be around for decades. Thank you for the consideration and for your work.

Best Regards,

Amy Wheless
Policy Associate