

Affiliated Tribes of Northwest Indians
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Allumia
 Alternative Energy Resources Organization
 Ameresco
 American Rivers
 Backbone Campaign
 Beneficial State Bank
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Byrd Barr Place
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 CleanTech Alliance
 Climate Smart Missoula
 Climate Solutions
 Community Action Center of Whitman County
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 Community Energy Project
 Earth Ministry
 Ecumenical Ministries of Oregon
 eFormative Options
 Elevate Energy
 Energy350
 EnergySavvy
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 Forth
 Global Ocean Health
 Green Energy Institute at Lewis & Clark Law School
 Grid Forward
 Homes for Good
 Home Performance Guild of Oregon
 Human Resources Council, District XI
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 League of Women Voters Idaho
 League of Women Voters Oregon
 League of Women Voters Washington
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Multnomah County Office of Sustainability
 National Center for Appropriate Technology
 National Grid
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest EcoBuilding Guild
 Northwest Energy Efficiency Council
 NW Natural
 OneEnergy Renewables
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oracle
 Oregon Citizens' Utility Board
 Oregon Energy Fund
 Oregon Environmental Council
 Oregon Physicians for Social Responsibility
 Oregon Solar Energy Industries Association
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Portland Energy Conservation, Inc.
 Portland General Electric
 Puget Sound Advocates for Retirement Action
 Puget Sound Cooperative Credit Union
 Renewable Northwest
 Save Our *wild* Salmon
 Seattle City Light
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Small Business Utility Advocates
 Snake River Alliance
 Snohomish County PUD
 Solar Installers of Washington
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeastern Idaho Community Action Agency
 Spark Northwest
 Spokane Neighborhood Action Partners
 Sustainable Connections
 The Climate Trust
 The Energy Project
 Transition Missoula
 UCONS, LLC
 Union of Concerned Scientists
 United Steelworkers of America, District 12
 Washington Environmental Council
 Washington Physicians for Social Responsibility
 Washington State Community Action Partnership
 Washington State Department of Commerce
 Washington State University Energy Program
 YMCA Earth Service Corps
 Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

State Building Code Council
 1500 Jefferson St SE
 Olympia, WA 98501

September 27, 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 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.

¹ RCW 19.27A.160 <https://app.leg.wa.gov/RCW/default.aspx?cite=19.27A.160>

² <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 Wheelless
Policy Associate