



March 11, 2020

Richard Brown, Ph.D., Architect  
Managing Director  
Washington State Building Code Council  
PO Box 41449  
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(360) 407-9277

Subject: Water Heater Installation Code Requirements

Dear Dr. Brown,

The Northwest Energy Efficiency Alliance (NEEA) would like to respectfully request your acceptance of our public statement regarding water heater installation requirements. It has potential to increase installations of currently available efficient water heaters, especially heat pump water heaters.

NEEA is an alliance of more than 140 utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers. NEEA is dedicated to accelerating both electric and gas energy efficiency, leveraging its regional partnerships to advance the adoption of energy-efficient products, services and practices.

Heat pump water heaters are an efficient product that NEEA has been working on for 30 years. NEEA's work includes identifying and removing market barriers and leveraging opportunities to increase adoption. One market barrier is the unnecessary installation of heat pump water heater on 18" stands. Installing contractors within Washington State have occasionally been required to install heat pump water heaters on a stand, even when there are no ignition sources within 18-inches of the finished floor. Elevating heat pump water heaters requires two installers instead of one to lift the unit increasing the installed cost of the equipment. The stand and added labor unnecessarily increase the cost of a heat pump water heater, provide no value to the consumer and hinder market adoption of this efficient product.

In retrofit applications, a new heat pump water heater the unit is often taller than the existing water heater being replaced. The additional height required to install the equipment on a stand may cause clearance issues in an existing space. Again, the unnecessary stand is a market barrier to market adoption of this efficient product.

Lastly, installer uncertainty due to inconsistent application of this requirement by different jurisdictions negatively impacts market adoption of this energy efficient technology. An official interpretation by the SBCC would provide clarity to all code officials concerning the installation



requirements and increase market adoption of currently available efficient water heaters and those coming to market, a pathway to more efficient and cleaner future for Washington State.

We appreciate your consideration and deliberation on this matter and if you have any concerns or questions please contact us.

Sincerely,

A handwritten signature in black ink that reads "Louis Starr". Below the signature is the NEEA logo, which consists of a stylized blue and green arrow pointing right, followed by the word "neea" in a lowercase, sans-serif font.

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