

July 15, 2021

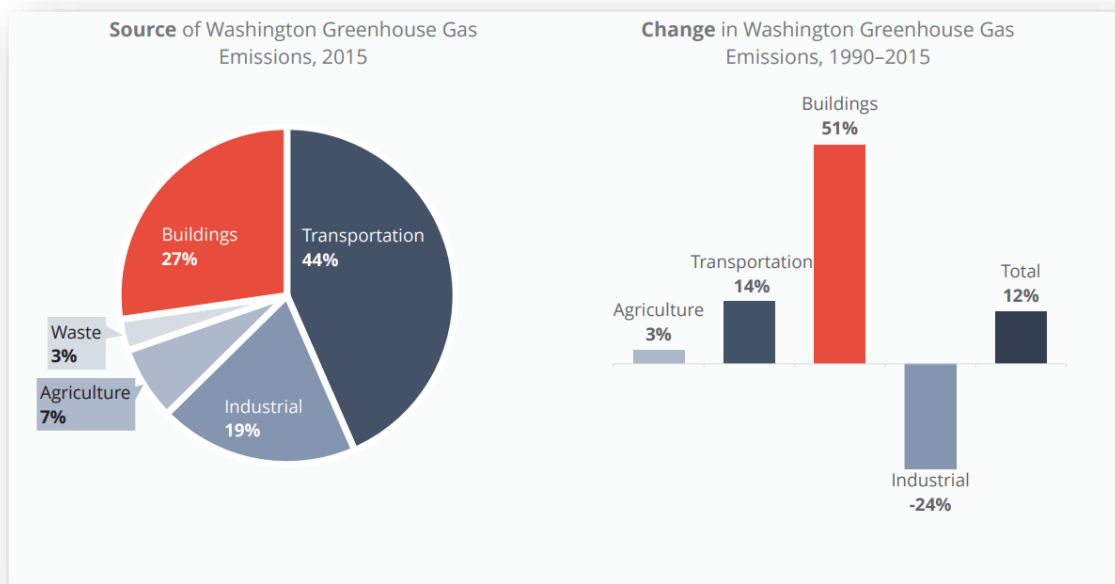
Kjell Anderson, Chair – Energy TAG
Washington State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Dear Mr. Anderson,

We write in support of two energy code proposals currently under consideration by the Energy Technical Advisory Group for the 2021 edition of the Washington State Energy Code:

- 21-GP1-103: Space Heating Proposal
- 21-GP1-136: Heat Pump Water Heating

These proposals will be important steps to take in our state’s efforts to dramatically reduce carbon emissions as building-related emissions are the fastest growing sources of greenhouse gas emissions contributing 27% of total carbon pollution in Washington State.



Source: Governor Jay Inslee Policy Brief, May 2019

These two proposals begin the long but necessary move to electrify commercial buildings and significantly reduce carbon emissions from direct use of fossil fuels for space and water heating. The proposals improve the energy efficiency of these buildings by primarily relying on heat pump technology – equipment that has a coefficient of performance multiple times higher than the fossil fuel equipment it would replace. This is the very definition of energy efficiency which is the foundation of our state’s clean energy future.

We recognize that this is a significant change in our approach to space and water heating of commercial buildings. There are first cost challenges to overcome, but like in previous code cycles, setting clear targets are the first, but not the only step to induce adoption. We encourage more discussion and a thoughtful process to establish incentives that encourage adoption. We are reassured that the market's adaptation to this change will occur over time, first affecting mostly new construction and only over time leading to conversion of much of the equipment in existing buildings. While the imperatives of climate change leave us with a very narrow window to act, we believe that the adoption of these proposals beginning in July 2023 is a reasonable balance of the time pressing need to act with the building industry's capacity to design and construct buildings consistent with these code requirements.

We strongly encourage you and your colleagues on the Energy TAG and on the Washington State Building Code Council to advance these proposals in your deliberative and thoughtful process to incorporate them into the next edition of the Washington State Energy Code and ensure our continued progress towards our 100% Clean, Zero Carbon future.

Sincerely,

Jonathan Heller, Ecotope



Josh Hatch, Brightworks



Dave Cook, Aspect



Steve Reidy, tk1sc



Kirsten Smith, AIA-WA Council



David Mount, Mahlum



Chris Hellstern, Miller Hull



David Goldberg, Mithun



Craig Wrench, WA Holdings



Michael Frank, McKinstry



Josh Yacknowitz, Arup



David Reddy, O'Brien360

