September 16, 2021

Stoyan Bumbalov, Managing Director WA State Building Code Council 1500 Jefferson St SE Olympia, WA 98501

Via Email: sbcc@des.wa.gov

CC: stoyan.bumbalov@des.wa.gov



RE: Please OPPOSE Proposals 21-GP1-103, 136, & 179

Members of the Washington State Building Codes Council:

On behalf of the Plumbing, Heating, Cooling Contractors Association (PHCC) we strongly OPPOSE the commercial energy code proposals 21-GP1-103, 21-GP1-136 and 21-GP1-179 and the Washington State Building Code Council should not include proposals 103, 136, or 179 in their version of the state's proposed Energy Code.

There is NO legislative authority for either the TAG or the SBCC to ban gas use or to reduce greenhouse gas emissions. The charter of this group is to improve efficiency and drive down energy use. It is also highly concerning that the members of the Energy Code TAG did not broadly, and actively, seek engage industry interests.

Additionally, it appears that these proposals have allowed a Political Agenda to influence their technical decisions and legislative responsibilities. Further, they have ignored their clear lack of authority to push a favored political outcome even with a lack of consensus and completely disregarded the expert technical testimony by the utilities (the only subject-matter experts in the meetings).

Finally, these proposals will limit consumers ability to choose the energy source that best meets their needs, will increase energy costs significantly, and will force everyone to rely entirely on the electric system which lacks the capacity to serve them. More importantly, these proposals will have almost no impact on the state's carbon emissions, which is the fundamental rationale behind these proposals.

Please Oppose proposals 103, 136, and 179; they exceed the TAG and SBCC authority and should not be included in the final version of the State's proposed Energy Code.

Thank you for your consideration.

Sincerely,

Jason Pritchard, PHCC President