

Northwest HVAC/R Association & Training Center

204 E. Nora Ave. Spokane, WA 99207 Phone 509-747-8810 www.inwhvac.org



September 19, 2021

Subject: Electrification

Dear State Building Code Council Members,

I am writing you for your consideration to OPPOSE energy code proposals 21-GP1-103, 21-GP1-136, & 21-GPA-179.

In affiliation with the utility companies, our organization was founded upon the increasing demand for new gas installations throughout the Northwest over 60 years ago. Natural gas is a reliable and clean energy resource that accommodates all regions for every season throughout the United States. It will continue to be available and allow for clean energy resources and assist affordable housing efforts for new construction and current energy consumption. Natural gas is the strongest and cleanest complement to renewables, as these renewables alone cannot provide enough power source for all Washingtonians. To not use such a valuable clean resource that is in our own backyard, and ban its consumption would be an unfortunate mis-judgement on behalf of your safety and economic responsibility for our Washington State citizens.

If the Council is going to venture into decisions that are easily construed as matters for the legislature and The People's vote, then the Council has an ethical obligation to the consumers by keeping them updated on what recommendations could affect their future energy decisions, costs, and limited access to electricity throughout various seasons. What do the people want? Unfortunately, no one can answer this because they were not asked by this Council. Do they feel natural gas is a climate change threat to them and their families and would they agree to move forward with electrification efforts and reduction of carbon emissions with the elimination of gas appliances proposed by this Council? Possibly, and possibly not? They should be involved through SBCC public announcements and non-bias surveys to get their true and honest feedback. Take for example the 9/15 public hearing. They were certainly not made aware of this process by the Council along with most all businesses and employees who actually work in the industry. Are proposals such as these really within the protocol and wheelhouse of this Council, or better left to the legislature? Were economic impact reports created and given to the public for consumer impact, in addition to small business impact that are required in the Council bylaws;

- *When reviewing proposed amendments to the codes, Technical Advisory Groups shall use a standardized, accepted methodology to consider economic impact on small businesses, housing affordability, construction costs, life-cycle costs, and the cost of code enforcement and shall report those findings to the Workgroup on Economic Impact.*

Northwest HVAC/R Association & Training Center

204 E. Nora Ave. Spokane, WA 99207 Phone 509-747-8810 www.inwhvac.org



Making these energy resources recommendations must be achieved in a fair and organized manner, with equal advisory representation from businesses, contractors, suppliers, manufacturers, utilities, trade associations, unions, technological professionals and most importantly consumers. This can be accomplished, as allowed per Council policies, through the creation of a special workgroup. State department employees, including those employees and interest groups of state funded energy profit and non-profit organizations, most certainly should be involved in the process and provide statistical data and various records that are not available to the stakeholders. Their involvement should only consist of helpful discussions and non-voting recommendations to an advisory group of professionals as those listed above.

I would ask the Council to provide public statements, prior to any action on these proposals to the following;

- We are averaging one of the lowest electricity prices in the nation at 8-cents per kWh. What will our estimated rates be in five-year increments given these proposals go in affect next year? And giving economic consideration to the recent passage of the carbon- pricing bill SB 2156, knowing that California is the only other state with a similar program and currently is double in KWh rates.
- What is the estimated cost for all existing commercial building owners that provide millions of square feet to restaurants and similar businesses that are dependent upon gas appliances to sustain their existence and employee tens of thousands of people, should they have to retrofit their equipment to renewables?
- What is the estimated cost for all existing commercial building owners that provide millions of square feet to all types of businesses, should they have to retrofit their heat sources into renewables? And do you foresee all of these costs being passed on to the consumer therefore increasing cost for all services?
- Is there enough electricity on the grid, and given current CETA mandates, to fully remove natural gas appliances from Washington State and not forecast any outages?
- If there is not enough foreseeable electricity without natural gas usage, will scheduled outages become the daily norm, and will these schedules adhere to less outages for regions that incur drastic hot and cold temperatures when compared to other milder regions where an outage will not as much affect their life-safety needs?

I would ask for your reconsideration on the current TAG recommendations and request a special Workgroup be developed for another full review of these code proposals, and for ALL proposals that concern electrification and natural gas. We would request the SBCC send a public notice for application to all Washingtonians, including all general contractors to assure that out-of-state businesses who choose to provide jobs for our citizens and pay employer taxes, also have a chance to participate. This will allow the SBCC to provide a detailed comparison of current TAG

Northwest HVAC/R Association & Training Center

204 E. Nora Ave. Spokane, WA 99207 Phone 509-747-8810 www.inwhvac.org



recommendations to future recommendations coming from a different group of voting members, from ground zero to the consumer who should be able to participate in making decisions on which fuel or energy source would be most beneficial for their consumers group they would represent. One or two public seats are not adequate. As stated above, all groups should have equal amount of representatives within the advisory group. Should this new workgroup agree with current TAG proposals, I would have more confidence in the SBCC moving forward and making these life- changing decisions.

Should the Council not consider the above request for a special Workgroup, then I would urge no action on these three electrification proposals and keep these types of code proposals in the hands of the legislature or a people's vote at the initiative level where they belong.

Sincerely,

Tena Risley

Tena Risley, Executive Director

[Northwest HVAC/R Association & Training Center](http://www.inwhvac.org)

204 E. Nora Ave. Spokane, WA 99207

Phone (509) 747-8810 Email tena@inwhvac.org