



SCHWEITZER ENGINEERING LABORATORIES, INC.

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September 13, 2021

State Building Code Council
1500 Jefferson Street SE
P.O. Box 41449
Olympia, Washington 98504
via electronic mail to: sbcc@des.wa.gov

Re: Washington State Energy Code – Commercial Code Proposals 2021

Dear Council Members,

I write to you on behalf of Schweitzer Engineering Laboratories (SEL) and our 5300 employee-owners, 2600 of whom are based here in Washington. SEL specializes in creating digital products and systems that protect, control, and automate power systems around the world. We appreciate the opportunity to share our thoughts as you work to update the commercial provisions of the Washington State Energy Code.

SEL is headquartered in Pullman, Washington, where our main campus is located, and we own a total of 1,012,032 square feet in buildings throughout the state. Our buildings are home to world-class engineers, sensitive equipment testing facilities, an employee healthcare clinic, an on-site daycare center, an event center, and several manufacturing lines. The complex and varied needs of our employees and different business lines require a thoughtful approach to how we heat and condition our buildings.

In our nearly four decades in business in Washington state, we have worked progressively toward more resilient and efficient buildings that all exceed LEED Silver performance expectations, and we have done so by taking advantage of a strategically balanced energy mix, which includes the use of natural gas. If SEL had to retrofit our buildings using the proposed codes that ban the use of natural gas, the material cost alone would exceed \$5 million, and then we project we would pay an additional \$500,000 annually in electricity charges. That is money that could not be used to hire new employees or to grow our business in the state. And we are just one company. We believe that the financial impact of these codes across the state will be considerable and would also uniquely penalize thriving businesses in less temperate regions in the state.

Beyond the cost, we worry about the impact on the reliability of our electric power grid. Our electric and gas provider, Avista Corporation, has recently cautioned that if all its natural gas customers converted to electric service, the peak load on its electric system would almost double. As a company of engineers specializing in electric power systems, we know all too well that when supply cannot meet demand, the lights go out. We respectfully ask that you please hit the pause button on these proposed code changes to study the effects that an aggressive course of electrification will have on the overall reliability of our power system. Businesses and families across the state will be impacted by this decision, and so it is crucial to understand that the full

Making Electric Power Safer, More Reliable, and More Economical®

reach of these decisions goes far beyond the walls of the commercial buildings to which these new codes apply.

We know that you have an important task and will hear from many stakeholders throughout this process. We appreciate your time and your consideration of our concerns. We are happy to provide additional information or answer questions as you move forward in this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jana Schultheis', written in a cursive style.

Jana Schultheis
Vice President of Property