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Question/Comment

The Washington State Hospital Association is very concerned about proposed amendment #21-GP1-136 regarding water heating. The proposed language appears to cause problems for hospitals' backup power systems. The Center for Medicare and Medicaid Services requires hospitals to have 96 hours worth of backup energy for when there is a power outage. Currently, hospitals' backup power is provided by fossil fuels and is unlikely to change due to technological limitations in the near future. Because of this, we are concerned that the wording of the proposed amendment precludes the use of fossil fuels as backup power for water heating. Therefore, we request the Council insert an exception modeled after exception #9 in revised 21-GP1-103 (space heating) to enable hospitals to work with Code Officers to ensure their federally required backup power requirements are met when installing new water heating systems.

WSHA is also concerned about proposed amendment 21-GP1-78 regarding renewable energy. Hospital finances are under severe strain due to the COVID-19 pandemic and will take years to recover. This proposed amendment adds significant cost to hospitals' construction projects that are likely to pose a financial hardship. Because of this, we request the Council adopt the same financial hardship exemption that exists in the Clean Buildings regulations (WAC 194-50-150).

Thank you very much for the opportunity to testify today. Please feel free to contact me with any questions.

-David Streeter