



September 16, 2021

Dear Washington State Building Code Council Members,

The Tri-Cities Legislative Council recently became aware of Commercial Energy Code Proposals 21-GP1-103, 21-GP1-136, and 21-GP1-179, and has serious reservations about their implementation and concerns for the negative impact to businesses across the state.

These proposals, as written, fail to provide equity in choice for efficient and cost-effective componentry for mechanical systems, and too few commercial quality options exist to replace existing equipment for all applications. As businesses continue to recover from the effects of the coronavirus pandemic they are investing in the construction of new and retrofit of existing commercial spaces. These proposals would reduce their access to efficient and cost-effective systems and place additional burden on their plans to help the economy recover. Often, those businesses require substantial structural modification to comply with or increase flexibility to respond to social distancing mandates where proposed standards on retrofit would substantially increase construction costs.

In addition to the issue of choice, these same businesses are facing supply-chain shortages on the most basic mechanical systems – at present between 6-9 months of delay to source replacement equipment. Reduced selection of new and retrofit mechanical equipment will place substantial liability on an already stressed supply chain, and further exacerbate lead time for end users.

The Tri-Cities places great importance on our regional and state responsibility to reduce carbon emissions and use of non-renewable resources; however, there is insufficient evidence to suggest these mechanical systems have substantial impact on the State's emissions while creating a significant burden for businesses at the most challenging times they've faced in over a decade.

The Tri-Cities Legislative Council strongly urges you to delay implementation of these proposals, and suggests further consultation occur to invest in alternative technologies, innovation in mechanical system design, and adaptive investment in natural gas infrastructure.

Sincerely,

A handwritten signature in black ink that reads "Miles S. Thomas".

Miles S. Thomas
Co-Chair, Tri-Cities Legislative Council

A handwritten signature in black ink that reads "Staci West".

Staci West
Co-Chair, Tri-Cities Legislative Council

CC: Stoyan Bumbalov, Managing Director