



UNITED ASSOCIATION

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should
be confined to
one subject

Mark McManus
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UA Local Union: **44** 3915 E. Main St. Spokane, WA. 99202

Subject: **Commercial Energy Code Proposals**

September 16, 2021

Washington State Building Codes Council

RE: COMMENTS ON COMMERCIAL ENERGY CODE PROPOSALS 103, 136, 179

Via email to: sbcc@des.wa.gov, stoyan.bumbalov@des.wa.gov

Members of the Washington State Building Codes Council (SBCC),

The United Association of Plumbers and Steamfitters Local Union 44 (UA Local 44) represent 500+ Journeyman and Apprentices throughout Eastern Washington. Our Members include Plumbers, Steamfitters, Welders and HVAC/R Technicians. Training through registered apprenticeship programs requires 10,000 hours through five years to achieve journey-level status.

The adoption of proposals 103, 136, and 179 would have a profoundly negative affect on our workforce and those workers being trained, as well as the quality of life of all citizens of our Evergreen State.

Specifics concerns:

21-GP1-103- Requires electric heat pumps for all new commercial construction and retrofits and bans the use of natural gas for commercial space heating (HVACs)

- Will add cost to commercial and multi-family development – it's estimated that electric heat pumps and installation costs approximately \$8,000 more than their gas counterparts. We have a housing affordability and homelessness crisis and adding any additional cost to multi-family housing will certainly be passed down to the consumer in the form of higher rent payments and/or developers opting to not build multi-family units. This cost increases substantially for retrofit projects.

21-GP1-136 – Bans the use of natural gas for commercial water heating uses and requires the use of electric heat pump for water heating purposes

- This is another component of building that will add cost. It's estimated that this will add approximately \$2,600 to the cost of building. This, coupled with a requirement for heat pumps and electric vehicle charging infrastructure (estimated to cost an additional \$2,500*), will do nothing more than cause rent to increase and reduce the likelihood of multi-family development for housing.



21-GP1-179 – Requires the installation of an electric receptacle wherever a natural gas appliance is installed in multi-family housing construction

- Another proposal that would make multi-family housing less affordable (\$250 per receptacle), nor does it save any energy or reduce emissions.

The above proposals would add an additional \$13,350+ to the cost of building multi-family housing units and is not in the best interest of Washingtonians.

In Eastern Washington we routinely experience harsh weather events such as ice-storms and wind-storms that knock out electricity. When the electrical grid is compromised, natural gas continues to heat homes and hospitals, thus saving lives.

The Spokesman-Review reported in a February 3, 2016 article, “Massive generators kept hospitals going during last year’s windstorm,” including:

“Even so, after about an hour on the generators, one of the seven machines shut down, causing immediate unease among the facilities crew, Myers said. They soon determined that the system purposely turned off the generator because the hospital’s load didn’t need it. The hospital’s boilers are powered by natural gas and continued operating normally during the outage.”

Additionally, it is not the SBCC’s authority to effectively ban natural gas (and appliances) on the basis of reducing greenhouse gas emissions statewide. There is no legislative directive to do so. In fact, HB 1084 was rejected last session. This would be the only instance in which the SBCC would be granted authority to make such a rule. Therefore, adopting code that would effectively phase out an entire industry that produces 15% of the electricity consumed in the state would be a major overstep of the SBCC’s rulemaking authority.

Lastly, for the past over five months I have participated as a member of the Spokane Sustainability Action Subcommittee (SAS). The purpose of this subcommittee is to discuss, discover, discern and deliver a robust set of viable and critical strategy proposals to the Spokane City Council in the form of the draft Spokane Sustainability Action Plan (SAP). Thousands of Spokane and Spokane-area citizens are reported to have been involved in the review of the draft SAP stakeholder process.

Please take note of the following key components of Spokane’s draft Sustainability Action Plan:

- The most contentious proposed strategy, Buildings & Energy Section 1.4 initially read, “Eliminate gas hookups from all new commercial and multifamily residential buildings by 2023, and from all new construction by 2028.” **This strategy has been removed from the SAP draft and from consideration as a strategy proposed to the Spokane City Council.**
- Strategies in the **current draft SAP include**, “Partner with Avista to increase renewable natural gas (RNG) into the gas supply.”

In summary, as you consider proposals 103, 136, and 179, please be aware that energy industry workforce considerations appear to have been neglected in this policy discussion. UA Local 44 members are proud to have built some of the most clean and green structures in the United States.

Respectfully,

A handwritten signature in black ink that reads "Brett Wideman". The signature is written in a cursive style with a prominent loop at the end of the last name.

Brett Wideman
Business Manager
UA Local 44