



September 17, 2021

Washington State Building Code Council

RE: Washington State Potato & Onion Association Comments Concerning Commercial Energy Code Proposals

Dear Members of the Washington State Building Codes Council:

Thank you for the opportunity to submit comments on the proposed commercial energy code proposals. The Washington State Potato & Onion Association (WPOA) is a non-profit corporation formed to promote the general welfare of the packers and shippers of potatoes and onions and allied industries in the state of Washington.

Agriculture is one of the most energy-consumptive sectors in the global economy. Energy consumption and fuel prices are a major overhead concern. WPOA is opposed to policies that eliminate the use of natural gas because they limit the ability of farmers to choose the energy source that best meets their needs and will increase costs and force farmers to rely entirely on the electric system.

Natural gas is used in the agriculture industry from every stage of food cultivation, harvesting and delivery. It begins with the soil first being tilled and fertilized to the time where fruits, vegetables, grains, meats and dairy products arrive at supermarkets. It is used for fuel for irrigation systems, farming equipment and transportation vehicles.

Natural gas is also used to fuel the heating systems in the homes of families that live on farms. With natural gas, families enjoy reliable supplies of heat throughout the colder months.

WPOA is also concerned with the public process to adopt these proposals. Specifically, we do not believe these proposed changes were developed in a transparent manner and have not been fully vetted. WPOA urges the Council defer any action on these proposals until a detailed economic, small business impact, and equity analysis is performed as required by the Administrative Procedures Act, RCW 34.05.328. This process requires a more in-depth analysis for rule adoption, including development of a cost benefit analysis of the proposed rule, consideration of alternatives to the proposed rule, and a determination that the proposal is the least burdensome alternative to achieve the general goals and specific objectives of the statute that the rule implements.

Thank you for considering our comments.

Sincerely,

Randi Hammer, Executive Vice President  
Washington Potato & Onion Association