



February 23, 2022

Washington State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Dear members of the Washington State Building Code Council,

We are writing to express our opposition to the following proposed code changes for the state energy code:

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.

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).

In Eastern Washington, our businesses and residents rely on natural gas to provide an efficient and reliable heating source and this proposal will directly raise the costs associated with running their business. We are also concerned about the impact of power reliability. Natural gas provides an alternative energy source we can count on during serious weather conditions when the electrical grid may be disrupted. A heat pump is an expensive and insufficient alternative, which the code recognizes, by allowing backup resistance heaters in certain areas of the state. This requires individuals to pay for two separate heating solutions for their buildings at additional costs.

The council has claimed these proposals will improve energy efficiency, but that case has not been made and without a cost benefit proposal, it's unclear as to what the gains will be vs the costs. As a business association, we understand the importance of advocating for small businesses to make the choice on which energy solution best suits their needs and interests. These policies remove that ability for them to choose.

Natural gas from buildings is responsible for less than 10% of the amount of the state's emissions. Policies like this will not move the needle enough to justify the added costs businesses will pay for new and redundant equipment, added utility bills, and higher rent. The case has not been made that these policies will advance energy efficiency and the TAG Energy group violated the APA to advance these policies without the required cost benefit analysis, which would have explored these costs. We urge a no vote on these two proposals. They will do little to advance the state's climate goals and will have a detrimental impact on the economic vitality and development of our community.

Sincerely,

A handwritten signature in black ink that reads 'Lance Beck'.

Lance Beck
President & CEO
Greater Spokane Valley Chamber of Commerce

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