

From: Bill Butler <bill@webpropertiesinc.com>
Sent: Monday, February 14, 2022 4:45 PM
To: DES SBCC <sbcc@des.wa.gov>
Cc: Bumbalov, Stoyan (DES) <stoyan.bumbalov@des.wa.gov>
Subject: 21-GP1-136 and 21-GP1-103

External Email

Dear members of the Washington State Building Code Council,

I am William E. Butler of WEB Properties, Inc. writing to express my 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).

I rely on natural gas to provide an efficient and reliable heating source for **the properties we manage and own in Spokane Washington (WHERE WE GET VERY COLD WEATHER IN THE WINTER)** and this proposal will directly raise the costs associated with running my business. I am also concerned about the impact of power reliability. Natural gas provides me with an alternative energy source I can count on during serious weather conditions when the electrical grid may be disrupted.

A heat pump is an expensive and insufficient alternative for my needs, which the code recognizes, by allowing backup resistance heaters in certain areas of the state. This requires me to pay for two separate heating solutions for my building 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 small business, I am best placed to make the choice on which energy solution best suits my and my customer's needs and interests. These policies remove that ability for me 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 I will pay as a business owner 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. **THIS 1 SIZE FITS ALL POLICY DOES NOT SERVE OR AFFECT ALL WASHINGTON AREAS EQUALLY.**

I 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 my business.

Thank you,

William E. Butler, RPA, CCIM
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