

Dear members of the Washington State Building Code Council,

I, Kelly Byrnes-Blake, PhD, am 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).

Will I don't rely on natural gas to provide an efficient and reliable heating source for my home or business, this proposal will directly raise the costs associated with running many businesses. I am also concerned about the impact of power reliability. Natural gas provides companies with an alternative energy source that they can count on during serious weather conditions when the electrical grid may be disrupted.

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 versus the costs. As a small business owner, I am best placed to make the choice on which energy solution best suits my needs and interests. These policies remove the 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 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.

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 businesses. The standard process for making changes like these should be adhered to, without taking shortcuts just to give the appearance of "going green".

Best regards,

A handwritten signature in black ink that reads "Kelly A. Byrnes". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Kelly Byrnes-Blake, PhD
Northwest PK Solutions, LLC