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Washington State Building Codes Council
Via: sbcc@des.wa.gov

RE: Support for Heat Pump Proposals (103 & 136)

Greetings Building Council Members,

My name is Rob Harmon. I have been a professional in the energy efficiency and renewables field for more than 30 years. I am the former Vice President and Chief Innovation Officer for the Bonneville Environmental Foundation. I reside on Vashon Island, where I run a clean energy consulting firm.

I currently work to enable deep energy retrofits of commercial buildings. I negotiated the long-term energy efficiency pay for performance contract between Seattle City Light and the Bullitt Foundation, which helped compensate the investor for making the Bullitt Center the most energy efficiency office building in the world.

I then assisted Seattle City Light and other stakeholders to expand this approach into the utility's Energy Efficiency as a Service program, which is focused on making new and existing commercial buildings vastly more efficient.

I write to urge you **support the heat pump proposals in the 2022 commercial energy code update.**

I can tell you, from decades of experience, that significantly improving buildings after they are constructed is very difficult and very expensive and hence, rarely happens.

You have an opportunity before you to ensure that we cease building new buildings that contain energy systems that damage the climate and harm the health of occupants.

But this is not simply about the environment and health. There is an important economic consideration as well.

If more fossil fuel infrastructure is installed anywhere, including in people's homes and businesses, only one of two things can happen:

1. The infrastructure will be used for its useful life. In this case we will use it for 30+ years, far beyond when we can still burn fossil fuels and maintain a healthy atmosphere. Or,
2. The infrastructure will be retired early and will need to be replaced with other non-carbon emitting equipment.

The cost of replacing that equipment will be paid by some combination of:

- a. Utility ratepayers (through subsidies),
- b. Taxpayers (through subsidies), or
- c. Building owners (and then their tenants through higher rents)

Whatever the combination, the burden of that will fall mostly on people of modest means. This will be as true in Spokane as it is in Seattle.

So, make no mistake, the decision before you is clear. A “No” vote is a vote for short-term profits for gas utilities and the building industry. A “No” vote is a vote for more fossil fuel infrastructure. That infrastructure will, without a doubt, either further damage our already vulnerable climate, or force its retirement costs onto the backs of people of modest means.

I urge you to vote yes.

Rob Harmon
Vashon, Washington