



Dear Members of the Washington State Building Code Council,

We, the Anacortes Chamber of Commerce, 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).

Many of our local residents and businesses rely on natural gas to provide an efficient and reliable heating source for their residence, place of work, and/or place of business and this proposal will directly raise the costs associated with maintaining their home and/or running their business. We are also concerned about the impact of power reliability. Natural gas provides an alternative energy source that they 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 our residents and business owners to pay for two separate heating solutions 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 individuals and small businesses, they are best placed to make the choice on which energy solution best suits their needs and interests. These policies remove that ability 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. Our residents will pay as a home and/or 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.

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 our local residents and businesses.

Thank you,

Jesica Kiser
President/CEO