



Washington Air Conditioning Contractors Association
5727 Baker Way NW, Suite 200
Gig Harbor WA 98332

February 25, 2022

Dear Member of the Washington State Building Code Council:

The Washington Air Conditioning Contractors Association (WA ACCA) whose members are HVAC/R contractors and distributors, respectfully asks you to reject commercial energy code proposals 21-GP1-103, 21-GP1-136, and 21-GP1-179. Our organization supports maintaining energy choice in both commercial and residential buildings particularly since changes like this in the commercial sector could drive up costs and negatively impact the residential building sector.

To achieve net zero emissions goals, Washington state needs to make sure there are a variety of clean burning fuel choices to achieve not only carbon emissions goals, but also to ensure maximum energy efficiency at the building level to reduce overall impact on the electrical load in our state. Until transmitting electricity becomes less expensive and the transmission of electricity itself is carbon neutral, increasing the load at the building level could only increase costs and require less carbon friendly methods to produce the electricity to meet demand.

In addition, with weather and other regional factors in our state creating electrical unpredictability we need to be able to assure back up for both commercial and residential customers in their heating, cooling, and refrigeration needs. The state of Texas showed us recently what a lack of fuel choice can mean in the delivery of energy to buildings and homes. Commercial buildings such as grocery stores must be able to have reliable sources of energy to keep food and other vulnerable products safe for consumers. In addition, many commercial buildings are relied upon to provide shelter during significant adverse events and may not be able to do this if entirely electric dependent.

To eliminate certain natural gas appliances in commercial buildings and then require costly electrical connections where there are gas appliances, could mean a lack of diverse fuel choice in new residential developments as contractors look to avoid the costs of running both natural gas lines and additional electrical connections. Not building new infrastructure for new commercial and residential developments could lead to expensive retrofits for future renewable gas and hydrogen technologies that may end up being more efficient and clean burning than electricity alone. It is much easier to retrofit appliances in buildings than to tear up streets or cut open walls to upgrade infrastructure to meet emerging fuel options.

At this point we believe the State Building Code Council should focus efforts on helping with existing energy code compliance while maintaining the best use mix of fuels to achieve goals. Location of the buildings, appliance availability and appliance efficiency should be the focus not decisions that could lead to elimination of specific fuels in the state. Decisions on whether or not to allow certain fuels like natural gas or appliances that use these fuels – which is far cleaner burning and often more energy efficient than other options still in use – should be reserved for discussions at the legislative level.

We appreciate the opportunity to provide this input and look forward to further discussions.

Thank you,

Craig V Olson
President
WA ACCA

WAACCA Mission: Washington WAACCA exists to educate our members and support legislatively the HVACR industry, ensuring consumer quality and contractor success.