

February 25, 2022

Dear Member of the Washington State Building Code Council:

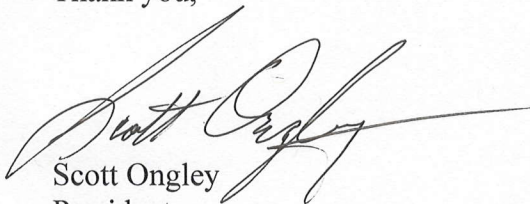
Northwest Hearth, Patio & Barbecue Association (NWHHPBA), asks you to please remove commercial energy code proposals 21-GP1-103, 21-GP1-136 and 21-GP1-179. NWHHPBA works with both residential and commercial to install clean burning, efficient natural gas appliances for heating, decoration and outdoor cooking. These products can be helpful in providing back up or supplemental heating and cooking thus allowing residents of apartment complexes or people in commercial areas to "shelter in place" during times of emergency. Inclusion of these three proposals will also negatively impact the residential building sector by making it more expensive to run natural gas lines to buildings in general. This will put many residents at risk of no supplemental heat in the event of an emergency impacting the power grid.

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 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 where no supplemental or back up heating appliance exists. In addition, many new commercial buildings are built in areas where woodstoves are not a viable option because of EPA non-attainment concerns. Although new woodstoves are very clean burning, there is a need to also allow natural gas appliances as well to ensure better air quality.

These proposals are clearly intended to stop the building of new gas infrastructure for commercial and residential developments. The impact of this could lead to expensive retrofits as the state moves towards renewable gas and hydrogen. It would be much easier to retrofit the appliances in buildings than to tear up streets or cut open walls build out new infrastructure to meet emerging fuel options.

Once again, we urge you to not adopt these sections into the updated commercial code. We appreciate the opportunity to provide this input and look forward to further discussions.

Thank you,



Scott Ongley  
President  
NW HPBA