

February 22, 2022

Andrew Klein, Chair
Washington State Building Code Council
PO Box 41449,
Olympia WA 98504-1449

Re: Proposals 103 and 136 – Washington State Energy Code

Dear Chair Klein,

As a ten-year member of the Washington State Building Code Council and former Council Chair for two years, I thank you and your colleagues for the arduous work of maintaining and improving the building codes for Washington State. I am well aware of the time and effort involved in serving on this Council.

I am writing specifically to express my support for two proposals under current consideration to the Washington State Energy Code – numbers 103 and 136. On the face of it, these proposals may appear to be overly ambitious in their scope, but I believe under closer consideration they are actually more modest in their ambition and carefully crafted to ensure that the state pursues in earnest its goals to reduce carbon emissions from the built environment while at the same time accommodating a pace of change within the energy and construction industries that allows the parties to reasonably adjust to new requirements. I will explain why I arrived at this conclusion.

Buildings are significant contributors to greenhouse gas emissions in Washington State. Since electricity in this state is, compared to other regions of the country, relatively low in carbon and required to be even less so in the near future, the direct use of natural gas for space and water heating is the most significant contributor to building sector greenhouse gas emissions. While further technical development of renewable natural gas (RNG) is likely, no reasonable independent forecast for RNG show this resource as sufficiently available and affordable for use in buildings at sufficient scale. The best and highest use of what RNG that is developed is in industrial and transportation sectors where there are few other no-carbon options. The most prudent path to reduce and then eliminate building related greenhouse gas emissions is to begin to reduce the use of fossil fuel space and water heating appliances and increase reliance for these end use applications on a clean and getting cleaner electricity system. This is consistent with the findings presented in the 2021 Washington State Energy Strategy.

This sort of transformative change is not a trivial pursuit. Moving heretofore served gas load to the electricity system will require good intermediate and long-term resource planning and the deployment of new tools for managing the grid efficiently and in ways that ensure both reliability and affordability. To our great advantage, the electric utility industry in Washington State is already well into the process of modernizing and managing the electric system for these changes. This work, which is on-going, began well before these proposals were put forward in the SBCC process. The Northwest Power and Conservation Council's recently adopted 8th Power Plan provides assurance that the region will be able to maintain a reliable and affordable electric system under a range of future scenarios including ones with strong actions toward de-carbonization.

With these facts in mind, I view the proposed space and water heating proposals now considered by the SBCC as modest steps in the process of reducing greenhouse gas emissions from the built environment.

There is near unanimous consent that the speed and depth of carbon reductions must be significant to avoid the worst effects on global climate. This urgency would seem to call for immediate and draconian measures. However, in recognition of the challenges in this effort, these carefully crafted proposals are a modest first step in meeting this climate emergency. At first glance, one might be surprised to see these proposals as a modest step forward. As such, it is helpful to examine what these proposals do not do. For example, the changes;

- Do not affect any residential construction smaller than multi-family buildings 4 stories and above
- Have no immediate effect on space or water heating fossil fuel appliances in existing buildings. This represents approximately 95% of all commercial buildings over the first five years of the code and 90% of buildings in the first decade.
- Neglect climate zones or special occupancy considerations. In all cases, new construction and eventual replacement of equipment, there are significant exceptions (17 in the case of space heating) to the requirements which provide ample flexibility for both cold weather climate zones and for special situations.

What these two proposals do is honor the time-tested proposition that when in a hole the first step is to stop digging.

These proposals will almost exclusively apply to new construction. According to data from the Northwest Power and Conservation Council, new commercial construction in Washington State is forecast to increase at a rate between .8% to 1.25% per year. As such, the movement of natural gas load to electricity is best described as a very slow boil. This rate of change should be sufficient to accommodate change in the electric industry as well as shifts in the construction trades responsible for installation of space and water heating equipment.

In conclusion, it is distinctly possible that these provisions will in later years be deemed to have been insufficient in addressing the calamitous effects of climate change. Time will tell if the more prudent course would have been a broader and more stringent set of proposals. That said, this Council has before it the opportunity to take a modest first step in reducing greenhouse gas emissions from the built environment. I encourage you to take this step.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stan Price', with a stylized, flowing script.

Stan Price
Washington State Building Code Council Member 1995-2005
Chair, SBCC 2003-2005