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Sent: Monday, February 7, 2022 12:57 PM
To: DES SBCC <sbcc@des.wa.gov>
Cc: Bumbalov, Stoyan (DES) <stoyan.bumbalov@des.wa.gov>
Subject: Public Comment/21-GPI-136 & 103

External Email

Dear members of the Washington State Building Code Council,

On behalf Rowley Properties, Inc., and the many customers we support, we are writing to express 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).

We rely on natural gas to provide an efficient and reliable heating source for our hotels and office/industrial flex spaces that provide necessary services for families and their children. This proposal will directly raise the costs associated with running the business on several fronts. But more importantly, it reduces the services we're able to provide when electricity is unavailable. Rowley Properties, Inc. has long since been concerned about the impact of power reliability given the age and state of the region's infrastructure/grid. We must as a region have diversity in power options and at the same time, proven reliability. Natural gas provides an alternative energy source that our customers can count on during serious weather conditions when the electrical grid may be disrupted.

A heat pump is an expensive and insufficient alternative for all needs, which the code recognizes, by allowing backup resistance heaters in certain areas of the state. This requires paying for two separate heating solutions for buildings at additional costs. Heating solutions some buildings may not have the space to provide for. 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 a small business, we are best placed to make the choice on which energy solution best suits our customer's needs and interests. And that do not drive up the cost of doing business or rents associated. These policies remove that ability to choose.

Policies like this are costly and produce unnecessary added costs we will pay as a 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. Further, we understand that 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 business.

Thank you,



Kristi Tripple

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