

Requests to Provide Public Testimony - Feb. 25, 2022

Proposed 2021 Washington State Energy Code – Commercial

Name	Group if applicable	Subject	Stance	Reason
Rep. Mary Dye		Electrification/103, 136, 179	Oppose	Loss of jobs and impact to the food industry in eastern Washington; impact the ability to maintain a robust natural gas infrastructure.
Rep. David Hackney		Heat Pump Proposals	Support	Reduce Emissions; ensure new facilities will not be required to remodel to meet the Clean Buildings Performance Standards
Sen. Liz Lovelett		Heat Pump Proposals	Support	Will set a standard for commercial building decarbonization
Rep. Davina Duerr		Making buildings more efficient	Support	Requirement will create a demand that will drive down the cost for efficiency measures
Sen. Mona Das		HB 1866	Support	Protect and sustain the environment and help repair historical inequities.

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Jonny Kocher	RMI	Energy Codes/Heat pump proposals	Support/ Proponent	Move away from fossil fuel use in buildings, which contributes a quarter of greenhouse gas emissions. Commercial building growth is 1% per year, allowing time for the grid to be built to accommodate the growth. Building electrification is the least cost strategy to decarbonize the public sector. Will submit changes based on comments from the Hospital Association and Schweitzer Labs.
Beth Doglio		Energy Codes/Heat pump proposals	Support	Last year the state passed the Climate Commitment Act, which lays the foundation to transition off fossil fuels. The legislative intent could not be clearer Washington State will transition away from fossil fuels. This is an important step in that transition.
Alejandra Mejia Cunningham	NRDC	Heat Pump Proposals	Support	Whatever building we don't build right today will need to be retrofitted at a much higher cost in the future.
Poppy Storm		Heat Pump Proposals	Support	It is important to reserve our costly renewable gas for key industries that are more difficult to electrify. Minimizing the need for pipeline gas in buildings that do have viable, effective electric alternatives is a key strategy for protecting industry.

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Mark Vossler	Washington Physicians for Social Responsibility	Building Codes and electrification	Support	The health impacts of air pollution and climate changes are well documented and anticipated to worsen over the coming decades. We have recently become aware of the health dangers of burning gas in homes and commercial buildings. Indoor air pollutants increase the risk for asthma, heart attack, stroke and dementia.
Maddie Smith	Earth Ministry/WAIPL	Energy Codes/Heat pump proposals	Support	The faith community cares deeply about environmental justice and clean buildings.
Dr. Chris Covert-Bowlds		Health benefits of electric heating/appliances compared to gas	Support	Research shows that buildings are the primary cause of combustion pollution related to early deaths in Washington.
Rick Marshall	Residential Developer in Camas	Heat Pump Proposals	Support	There is a huge demand for high quality multifamily housing. Large, high quality, energy efficient multifamily and mixed use homes are crucial in today's environment, and they need to be healthy for their occupants and neighbors. Our experience with wildfire smoke, heat domes and working from homes means that AC is becoming a requirement.
Holly Townes, ME PE		Energy Code	Support	ASHRAE, the professional society that sets the standards for the HVAC industry believes this is the way to go.

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Duane Jonlin	City of Seattle	Heat Pumps	Support	Building stock only grows about 1% a year, so there would be maybe a 1.3% increase in electrical load. The increase of about \$1000 and it protects the tenants from future spikes in gas prices.
Don Steinke	Climate Action of SW Washington	Heat pumps for commercial bldgs	Support	
Cathryn Chudy		Commercial Energy Code Updates/ Clean Buildings	Support	
Lisa Parshley	Olympia City Council & Thurston Co Climate Mitigation Steering Committee	Heat Pump Proposals	Support	
Paul Knox		Heat Pump Proposals	Support	
Martha Baskin	Sierra Club		Support	
Joseph Szwaja		Electrification of Buildings	Support	
Andrea Scott-Murray		Clean buildings and health concerns	Support	
Dr. Pamela Braff		Heat Pump Proposals	Support	
Dr. Breck Lebegue	Washington Physicians for Social Responsibility	Electrify Buildings	Support	
Alona Steinke	Climate Action of SW Washington	Heat pumps for commercial bldgs	Support	

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Andrea Smith	Building Industry Association of Washington	Electrification/103, 136, 179	Oppose	Limiting energy choices will detrimentally affect families that can least afford it. Concerns with the electric grid reliability.
Nancy Henderson		Heat Pump Proposals	Support	
Peter Godlewski	Association of Washington Business	Proposals on commercial natural gas	Oppose	Concerns on the develop process
Dylan Plummer	Sierra Club	Electrification	Support	
Jonathan Heller	Ecotope	Heat Pump Proposals	Support	
Gordon Wheat	Olympia PSR Climate Task Force	Public health and building electrification	Support	
Jacob Gailey		Heat pump building codes	Support	
Sloan Ritchie		Builder perspective	Support	
Natasha Jackson	NW Gas Association		Oppose	
Pamela Colley	Schweitzer Engineering Labs	Heat Pump Proposals	Oppose	
Rex Habner	IBEW Local 77	Heat Pump Proposals	Oppose	
Christine Reid	IBEW Local 77	Heat Pump Proposals	Oppose	
Lisa Rosenow	Evergreen Technology Consulting	General support of full package	Support	
Ruth Sawyer		Support for heat pump proposals	Support	

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				The proposals before the council is not preempted by federal law based on similar case law. Three cities have adopted similar codes with only one being challenged, and that challenge was not successful.
Jan Hasselman	Earthjustice	EPCA Preemption Risk	Support	
Deepa Sivarajan	Climate Solutions	Heat Pump Proposals	Support	
Elizabeth Kearny		Heat Pump Proposals	Support	
Bill Sampson		Commercial Building Codes		
Kevin Kajita	Hospitals	C403.1.4/Space heating	Concerns	Should be modified to exempt essential facilities required to have emergency backup power. Also prefer Option 2 in C503.4.6.
Jonathan Lewis	Hospitals	C404.2 and C403.5	Concerns	Add exemption for essential facilities. Prefer Option 1 in C404.2 and Option 2 in C503.4.6.
Monica Zazueta		Clean building codes	Support	
Rich Voget		No fossil fuel in new commercial construction	Support	
Carolyn Logue	WA Air Conditioning Contractors & NW Hearth Patio & Barbecue Assoc.	Electrification/103, 136, 179	Oppose	Goes too far in a time we can't afford to do that. Would degrade the ability to have natural gas hookups. Would hinder the development of hydrogen fuel sources.
Kelly Rankich	21 Acres	Commercial building efficiency	Support	
Luke Howard	Department of Commerce	21-GP1-156 (Carbon emissions factor for electricity)	Support	The proposal aligns the state code with the Clean Energy Transformation Act enacted in 2019.

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Geoffry Glass		Heat Pump Proposals	Support	
Kevin Duell		Electrification/103, 136, 179	Oppose	Data from Commerce shows that the use of gas in commercial buildings is 3.3% of the state's greenhouse gas emissions, so electrification would not have much of an effect on emissions but would add cost.
Robin Briggs		Commercial Energy Code	Support	
Steve Gelb	Emerald Cities Collaborative	Energy Code Updates and Equity	Support	Combustion of fossil fuels in buildings creates outdoor air pollution that is disproportionately concentrated in low income and communities of color. Don't burden low income communities with outdated systems.
James O'Neill	Affordable Energy Coalition	Gas ban	Oppose	Increasing energy costs by banning natural gas will place more of a burden on low income and BPoC communities.
Gary Heikkinen	NW Gas Association	Table C407.3(1) Carbon Emissions Factors - 156	Oppose	The model used to derive the 0.4 proposed electric metric doesn't adequately assess policy driven electrification. Retain the current value or use 0.8 as is used in the residential energy code.
Joelle Robinson		Strengthening commercial and large multifamily building energy codes	Support	
Nicolas Garcia		Commercial code solar requirement/ C411	Concerns	Please suspend any action on 078 until a full review of the cost benefit analysis.

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Patience Malaba	Housing Development Consortium of Seattle-King County	SBC Code Proposal	Support	By building affordable housing projects that are clean and resilient from the outset, we will be prioritizing the frontline communities that bear a disproportionate burden of the harm caused by pollution and climate change.
Maria Batayola			Support	
Bill Will	WA Solar Energy Industries Association (WASEIA)	C406, C407 and C411	Support	
Heidi Culbertson		Electrification	Support	
Melinda Hughes	Thurston Climate Action Team	Heat Pump Proposals	Support	
John Rothlin	Avista	Heat pump and solar amendments	Oppose	
Rachel Wood	Washington Physicians for Social Responsibility	Heat Pump Proposals	Support	
Jeni Woock	City of Gig Harbor	HB 1770	Support	
Skander Spies PE		Electrification	Support	
Brad Lijequist	McKinstry	Energy Code Heat pump provisions	Support	Heat pumps are ready for prime time. Competition drives competitive pricing, but entrenched technology often requires a concerted push to see market acceleration.
Ty Stober, Mayor Pro Tem, Vancouver		Commercial Building Energy Code	Support	

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Jeff Yirak		Heat pumps in Eastern WA	Support	Heat pumps are an appropriate solution in Climate Zone 5.
Bryan Ahee	Bradford White Corporation	206 (load management), 103 (HP space heating), 136 (HP water heating)	Oppose	Do not adopt the minimum efficiency requirements for gas fired and oil fired boilers-- DOE is currently hearing appeals. Do not adopt the load management requirements in 206; there are too many gaps regarding energy credit values. Do not adopt the boiler control requirements in 099 which may cause confusion with Commerce's rules. We also feel the HP proposals were rushed and industry stakeholders not engaged.
Adam Hutchinson	Eastern Wa Masonry Producers Association	207/208 Mass Walls	Oppose	Do not adopt these proposed amendments. The covered building types will lose durability and fire resistance for negligible energy savings and job losses.
Lowell Glodowski	Bricklayers and Allied Craftsmen	207/208 Mass Walls	Oppose	The proposals are not fully justified.
Bruce Corigliano	White Block Company	207/208 Mass Walls	Oppose	
Kevin Krebs	Mason Industry Promotion Group	207/208 Mass Walls	Oppose	
Jed Olafson	Johnston Construction Company	207/208 Mass Walls	Oppose	
Blair Harter	Basalite Concrete Products	207/208 Mass Walls	Oppose	

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Ali Lee			Support	
Jonathan Kwong			Support	
Coleen Anderson		Support of HP proposals	Support	
Kathleen Petrie	King County	Energy Code	Support	In support of HP proposals and others as stated in written testimony. Support adoption of 208.
Larry Andrews		103, 136, 177, 174, 175, C404.11	Oppose	There is no rise in carbon dioxide concentration. The electrical infrastructure is insufficient. HP cannot operate at -5. Longevity issues with HP.
Brian Emanuels	Climate Solutions	Heat Pumps	Support	