



April 20, 2022

Washington State Building Code Council  
1500 Jefferson Street SE  
Olympia, WA 98501

**RE: Proposed Temporary Heat Pump Efficiency Reduction**

To Whom It May Concern,

The Building Industry Association of Washington (BIAW) gives a voice to 8,000 members that include builders, remodelers, and skilled trades professionals. We are writing in support of a proposed temporary amendment to the 2018 Residential Energy Code efficiency requirements for ducted heat pump systems.

Specifically, we support the amendment proposed by the Washington Air Conditioning and Contractors Association: “to consider a temporary efficiency reduction be applied to all ducted heat pump split systems (below 65,000 btuh) from the current 11.0 HSPF requirement to the federal minimum of 8.2 HSPF per the 2018 WSEC Table C403.3.2(2) while maintaining the 1.5 points provided by energy credit 3.5a.” We also support their request for the amendment to be in place until December 31, 2023.

This amendment is necessary to increase the range and availability of viable ducted heat pump split systems that can be installed in newly constructed homes. There are more than 800,000 AHRI rated heat pump systems, but only 64% meet the 11 HSPF requirements as mandated by the current energy code. Supply chain issues have affected every manufacturer and thus, the qualifying components/systems have become unavailable in sufficient quantity to keep pace with market demand driven largely by 2018 Energy Code.

We do appreciate the actions taken by the State Building Code Council (Emergency Rule #CR-103E) in response to our original request. However, the actions taken by the council actually exacerbated issues within the supply chain. [*Please see enclosed for reference.*]

Our members strive to build quality, affordable, and efficient homes in a timely manner. A temporary reduction in system efficiency requirements will help in many ways. Most important, it will provide access to available, efficient equipment while manufacturers work to restore production.

We recognize the pressure facing the council to meet legislative mandates. However, unprecedented scenarios require unprecedented action. We strongly urge your immediate consideration of the proposed temporary amendment to the 2018 Energy Code.

Sincerely,

Greg Lane  
Executive Vice President, Building Industry Association of Washington