

Northwest HVAC/R Association & Training Center

204 E. Nora Ave. Spokane, WA 99207 Phone 509-747-8810 www.inwhvac.org



May 15, 2022

RE: Requesting Emergency Efficiency Reduction to 8.2HSPF for Residential New Construction WSEC Table C403.3.2(2)

To Washington State Building Code Council,

Due to the ongoing global HVAC equipment shortage, your immediate consideration and action is requested to reduce the current heat pump efficiency requirement found within the Residential Energy Code for new construction;

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 would like this to be in effect through 12/31/2023. Maintaining the 1.5 points within this request is essential to the industry during these unpredictable times.

Included with this request; In Summer 2023, to perform a direct study with all heat pump manufactures and their distribution centers to determine their current status, backlog and availability of that state's desired 11.0 HSPF equipment to determine if the 12/31/2023 should or should not be extended.

The current Washington State requirement of 11.0 HSPF goes well beyond the federal requirements and the Energy Star ratings. Thus creating an unnecessary obstacle for the contractors and overall burden and potential cost increase to the consumers given this "unknown" future of when and what type of equipment will become available.

As industry professionals, we are all aware that correct sizing is critical to energy savings and the life of the equipment. Should mis-matched equipment be the only option for the operation of the split system, this leaves the homeowner with the only one reasonable choice which is go without until someday in the future when the supply chain can start to replenish itself. The only viable option is to reduce the current state HSPF mandates.

Thank you,

Tena Risley

Tena Risley, Executive Director
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