

See below for editorial comments for the proposed code language for code change proposals to be reviewed at the Council Committee Meeting on 9/15/2023.

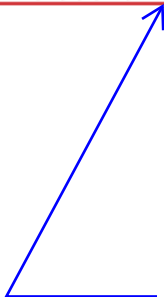
Comments are based on the Com_energy_draft_code_text_091223 file that was posted for the Council Meeting:

EVM Comment:

C401.3 Fossil Fuel Compliance Path. Buildings complying with the Fossil Fuel Compliance Path shall comply with the prescriptive compliance path of this code as defined in Item 1 of Section C401.2, and as modified by this Section C401.3.

C401.3.1 Modification of code requirements. For use of this compliance path only, the following changes shall be made to this code:

1. **Section C403.1.4 – space heating.** Strike the phrase “...or fossil fuel combustion...” from the first sentence of Section C403.1.4.
2. **Section C404.2.1 – service water heating.** Revise the first sentence of Section C404.2.1 to read: “Service hot water shall be provided by fossil fuel appliances or an electric air-source heat pump water heating (HPWH) system meeting the requirements of this section or any combination of the two.”



EVM Comment:

The "statement of any combination of the two" as written is unclear that fossil fuel equipment systems or the combination of electric heat pump and fossil fuel equipment need to comply with this section.

Recommending revising to to maintain consistent language between sections and Table C404.2:

Service hot water shall be provided by fossil fuel water heating equipment, electric air-source heat pump water heating equipment, or a combination of the two equipment types meeting the requirements of this section.

Current 2021 WSEC-C Language for Reference

C404.2 Service water-heating equipment performance efficiency. Water-heating equipment and hot water storage tanks shall meet the requirements of Table C404.2. The efficiency shall be verified through certification and *listed* under an *approved* certification program, or if no certification program exists, the equipment efficiency ratings shall be supported by data furnished by the manufacturer. Water-heating equipment intended to be used to provide space heating shall meet the applicable provisions of Table C404.2.

C404.2.1 Service water heating system type. Service hot water shall be provided by an electric air-source heat pump water heating (HPWH) system meeting the requirements of this section. Supplemental service water heating equipment is permitted to use electric resistance or fossil fuel in compliance with Section C404.2.1.4.

**TABLE C404.2
 MINIMUM PERFORMANCE OF WATER-HEATING EQUIPMENT**

Equipment Type	Size Category (input)	Subcategory or Rating Condition	Draw Pattern	Performance Required ^{a,j}	Test Procedure ^b