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YEARS OF
EXCELLENCE

Andrews
Mechanical, Inc.

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To the Washington State Building Code Council comments on WAC 51-11C-40314 Use of Electrical Resistance and Fossil-Fired HVAC Heating equipment.

1. I am not in support of WAC 51-11C-40314 at all, it should be totally removed from the energy code.
2. All the new Building/ Manufacturing construction is being powered electrically by Fossil fuel to make this electricity. Fossil fuel electricity is at least 3 times larger carbon footprint than fossil fuel for straight heating.
3. Natural Gas has Global warming potential of 80.
4. CO2 has a Global warming potential of 1.
5. Natural gas when burned yield CO2 so Natural gas goes from 80 down to 1 when burned is a Dramatic reduction in global warming potential.
6. Natural Gas is lighter than air.
7. There is no way to stop Natural gases from leaving the ground.
8. There is an unmeasurable amount of natural gas ready to go into the atmosphere and cause Global warming or if the percentages of Natural gas got high enough there could be a rapid expansion in the atmosphere from natural occurring releases.
9. The only way to slow down the amount of Natural gas from leaving the ground is to consume Natural gas by burning it in a manner that reduces the Global warming potential of Natural gas to 1, then use the CO2 to make everything that is made from other fossil fuel with that CO2. See the (Twelve Company) and other Spokane Company's
10. Most fossil fuels will turn into some form of Natural gas in time.
11. Natural gas will be with us until the end of time, it is a natural product made of the earth not manmade like electricity is.
12. By **not** using Natural Gas for heating our homes and business the electrical grid is being overtaxed. **Last year we came so close to a complete State black out , that utility's had to pay \$1.00 per kilowatt at the wholesale level for power from other states to keep the electrical from a completely dropping out. You must remember \$1.00 per Kilowatt is the maximum that can be charge at the wholesale level to date for power. This would be over 10 to 20 times of what a consumer's pay for their energy at the consumer level. To**

maintain power for buildings and homes, some utilities did have some black outs due to lack of power during this time.

13. By not using Natural Gas for heating our homes and business the required electrical infrastructure we would have to double in size to carry the extra load. So, you have more chances of another Grey fire that wiped out 240 homes in one day with the extra electrical required infrastructure required if it was not for Natural gas being used.
14. By not using Natural Gas to heat our homes and business the required land for the infrastructure would have to double.
15. By not using Natural Gas for heating our homes and business the required permits that would have to be required for this infrastructure would be requirement is not attainable, nobody want's any more electrical by their land due to the EMF that is given off by the power.
16. By not using Natural Gas for heating our homes and business we won't have the power to convert a large percentage of cars to electric because there won't be the power to charge them.
17. There is 1-1/2 times more trees in the United States for the reduction of CO2 then there is CO2 made in the United States.
18. Electricity is more dangerous than Natural Gas, this was made clear by the Grey Fire in Eastern Washington that wipe out 240 homes that were lost in one day in 2023, caused by faulty electrical light, and an Electrical Arc fault that is hotter than the sun, Washington State requires Electrical licensing for electrical due to the dangers of electricity, where when that electrical arc hits the ground anything that is combustible ignites, Electricity is the ignition source. Whereas Natural gas there are no such requirements by the state for state licensing, also with electricity you can't see it or smell it, whereas Natural gas you can smelled the natural gas and with Gas detectors you can hear the alarm. With Natural gas there must be just the correct mixture for the gas to ignite plus a source of ignition. **Natural gas is much safer than electricity.** Other fires cause by electrical lines in recent year past is the Smoke House fire creek in Texas with destruction of 400 to 500 structures and tens of thousands of cattle were killed.
19. You must remember that there is no electrical power suppling system that can bridge this gap and that is feasible to supply this gap that utilities know about or are willing to fund in this climate. Renewables are only providing a drip in the bucket and the true cost of these would bankrupt the country. We are 37 trillion in debt as a country now with a Trillion more every 100 days that goes buy. Each taxpayer who pays taxes owes over **\$200,000.00** to the government now as it is now. This debt as it grows causes inflation and cost of everything goes up.

Everything above is indisputable facts about Natural gas. If you are not able to bring your self to completely remove WAC 51-11C-40314 then I would take Option 2 as the least of these evils.

Larry Andrews president