

September 20, 2024

Washington State Building Code Council  
ATTN: Council Members via [sbcc@des.wa.gov](mailto:sbcc@des.wa.gov)  
1500 Jefferson Street SE  
P.O. Box 41449  
Olympia WA 98504

**Re: Support for the Petition to Amend the 2021 Washington State Energy Code – Commercial**

Dear Council Members,

On behalf of the Northwest Gas Association and its Washington members, Puget Sound Energy, Avista Utilities, Cascade Natural Gas and NW Natural, I respectfully request that the Council support our petition concerning Section C403.1.4.

This part of the code is about hybrid heating – using gas and heat pump technologies together. This equipment has been available for many years in a large size range from major manufacturers like Carrier, Daiken, Lennox, Trane, York, etc.

Hybrid heating dramatically lowers emissions – by eliminating electric resistance use when gas is at its best and eliminating gas use when the heat pump is at its best. In this way, it lowers operating costs compared to all-electric heating, especially in frigid Eastern Washington winters, while also reducing peak winter electricity demand. Plus, it allows building owners to use smaller generators to stay warm during power outages, reducing construction and operating costs.

Hybrid heating is currently part of the Residential Energy Code. The Commercial Energy Code allows it for service hot water without following the fossil fuel path. The Commercial Energy TAG voted to allow it without following the fossil fuel path. SBCC members of the Mechanical, Ventilation and Energy (“MVE”) Committee *unanimously* supported the TAG’s guidance to allow hybrid heating.

Therefore, we request that the Council respect the will of the TAG and the MVE Committee and vote to keep hybrids in the Commercial Energy Code by accepting our Petition to remove the words “electric resistance” from Section C403.1.4, Exceptions 5 and 7.

Please acknowledge your receipt of my request and confirm its disposition. Thank you for your consideration.

Sincerely,



DAN S. KIRSCHNER  
Executive Director

cc: Dustin Curb, State Building Code Manager via [dustin.curb@des.wa.gov](mailto:dustin.curb@des.wa.gov)  
Krista Braaksma via [krista.braaksma@des.wa.gov](mailto:krista.braaksma@des.wa.gov)