

September 11, 2024

Mr. Daimon Doyle
Council Chair
State Building Code Council ¹
Washington State Department of Enterprise Services
1500 Jefferson St SE
Olympia, WA 98501

RE: Proposed amendments to WAC 51-11c-40314 – HVAC heating equipment (WSR 24-16-146).

Dear Mr. Doyle:

Washington Public Utility Districts Association (WPUDA) supports **OPTION 2** listed in WSR-16-146 pertaining to *use of electric resistance and fossil fuel-fired HVAC heating equipment*. This option proposes to strike the words “electric resistance” from items 5 and 7 of Section C403.1.4 in the 2021 Washington State Energy Code.

In the second week of January of 2024, electric utilities in Washington state experienced a near miss scenario where cold weather heating demand consumed all available generating and contract energy resources. This narrowly avoided blackout came at a high cost through purchasing energy resources at a premium from California.

The consequence of limiting secondary heating options to electric resistance increases the risk for a “blackout” scenario.

The proposed changes in **OPTION 2** will help reduce the risk of Washington having insufficient energy resources during extreme cold events.

Thank you for the opportunity to provide these comments. Please contact me directly at 360-890-6681, or tnelson@wpuda.org to answer any questions or provide additional clarifications.

Sincerely,



Travis Nelson, Regulatory Affairs Manager
Washington Public Utility Districts Association

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