



STATE OF WASHINGTON

## STATE BUILDING CODE COUNCIL

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### Commercial Energy Code Technical Advisory Group Meeting Review Notes for February 28, 2025

**TAG Members Present:** Kjell Anderson, Chair; Larry Andrews; Kim Barker; \*Rick Blumenthal; \*Andi Burnham; \*Ian Casey; \*Kevin Charap; \*Brett Conway; Kevin Duell, Luke Howard; Gregory Johnson; Duane Jonlin; \*Nick Massie; Nathan Miller; Margaret Montgomery; \*Erik Olon; Irina Rasputnis; Sloan Richie; \*Kevin Roberts; Lisa Rosenow; \*Deepa Sivarajan; Poppy Storm; Irina Susorova; Shaun Vig; Markus Virta

**TAG Members Absent:** \*Todd Blevins, Erik Bedell, \*Marty Brennan, \*Shailesh Desai, Alessandra de la Torre, \*Premkumar Siddharth

**Visitors Present:** Ben Omura, Ray Allshouse, Jason Armstrong, Tim Attebery, Lindsey Gaunt, Jeff Giffin, Pragma Gupta, Patrick Hanks, Patrick Hayes, Gary Heikkinen, Carlos Herrera, Paul Holt, Mike Kennedy, Rob Kilmer, Jonny Kocher, Hendry Odum, D. Scott Peterson, David Reddy, Tena Risley, Kevin Rose, Shashank, C. Singh, Elizabeth Torske, Erick Urban

**Staff:** Krista Braaksma

\* indicates an alternate member

Agenda Items	TAG Actions
1. Welcome and Introductions	Meeting called to order at 8:30 a.m. Kjell Anderson welcomed everyone, and roll was called.
2. Review and Approve <a href="#">Agenda</a>	The agenda was approved as written.
3. Review and Approve meeting notes from <a href="#">February 7, 2025</a>	The summary minutes were approved as written for the February 7, 2025, meeting.
4. Review of Proposals	
Strike/Modify Section C401.3	
<a href="#">24-GP1-183</a>	<p>Gary Heikkinen introduced his petition to strike the entire fossil fuel path, including anything associated with it as it clearly violated Initiative 2066. It does leave some modified language on the sizing of heat pumps water heaters. The proposal maintains the two credit tables in C406, but the credits themselves would need to be recalculated by PNNL. The proposal also adds provisions for gas-fired heat pumps.</p> <p>Lisa Rosenow noted that there is also a reference in Section C403.10.3 that reference fossil fuel that should be addressed as well.</p>

	<p>Mike Kennedy noted that direction needs to be given to PNNL as to the basis for the credits and how they are to be determined, especially if a single table is used.</p>
<p><a href="#">24-GP1-279</a> Kocher</p>	<p>Jonny Kocher introduced his revision to petition 279, noting the changes are highlighted in blue. It goes back to providing two C406 tables, but the credits will need to be reevaluated. Right now they are based on site EUI. The calculation was changed to be more accurate. He included an annual energy factor to the calculation for heat pump systems to attempt to provide an annual efficiency. Based on discussion within the TAG, Greg and Duane will check with ASHRAE to see if there is a way to take defrost cycles into consideration.</p> <p>Greg Johnson pointed out that the some of the deleted exceptions were not connected to a supplemental system and should be retained. Jonny noted that there was still some editing that needed to be done within the proposal.</p> <p>Patrick Hanks felt it was hard to evaluate the proposal without the actual credits required so that any cost discrepancy between the two tables could be determined.</p> <p>Mike Kennedy spoke against including the NEEA water heater specifications. He did not feel an installation standard was appropriate within the code.</p>
<p><a href="#">24-GP1-279</a> Heikkinen edit</p>	<p>Gary Heikkinen stated that he took Jonny Kocher's petition and doubled the old credits required per Table C406.1 as a starting point. He also felt the new Kocher 279 still penalized natural gas equipment since the baseline is calculated using the least efficient equipment. Gary proposes using a source energy factor, using Kocher's original 279 petition, based on 2018 eGrid data to allow the use of a single table with more equitable results.</p> <p>TAG discussion centered on the use of equipment and system efficiency rather than fuel type. The Chair also reminded the TAG that site energy is still being used as the default until the Council renders a decision on whether to use a site or source energy basis.</p>
<p><a href="#">24-GP1-285</a></p>	<p>Larry Andrews felt that heat pump systems don't last and break down and need more service than a gas furnace. It drives up the cost and increases the carbon footprint. He also felt you needed separate baselines for both system types.</p> <p>The TAG briefly discussed efficiency and installation practices.</p>
	<p>The TAG spent some time discussing all three proposals. A motion was made and then withdrawn to table both versions of 279 and 183 while disapproving 285. The Chair instead urged the TAG to pick a petition as a vehicle to modify as the TAG moved forward.</p> <p><b>Motion:</b> Lisa Rosenow moved to forward <b>Kocher's 279</b> to a workgroup to address issues discussed by the TAG. Duane Jonlin seconded the motion. The motion carried, 10 to 4 with two abstentions.</p>

	<p><b>Motion:</b> Kevin Duell moved to table <b>183 and Gary Heikkinen’s 279</b> edits. Gregory Johnson seconded the motion. The motion carried, 13 to 0 with two abstentions.</p> <p><b>Motion:</b> Lisa Rosenow moved to disapprove <b>285</b>. Kim Barker seconded the motion. The motion carried, 13 to 1 with one abstention.</p>
Section C403	
Section C403.1.4	
<a href="#">24-GP1-194</a>	<p>Duane Jonlin’s petition allows several new exceptions and some clarification to help increase constructability based on comments received by Seattle over the last couple of years.</p> <p>The TAG discussed how this would be impacted by 279 and the importance of retaining the exceptions in this section based on the C406 credit calculations.</p>
<a href="#">24-GP1-249</a>	<p>Ben Omura presented 249 for the proponent. It has several nuanced differences from the exceptions proposed by 194 and does not include the essential facilities portion of 194.</p> <p>The TAG discussed the petition and the various new exceptions. It was mentioned that the new exception 19 covered all facilities addressed in exception 18 and thus exception 18 was no longer necessary.</p> <p><b>Motion:</b> Duane Jonlin moved to accept 249 with the modification of adding the language from exception 2 from 194 and removing exception 18. Gregory Johnson seconded the motion. The motion carried by voice vote with no opposition.</p> <p>Duane Jonlin withdrew his 194 based on the modification of 249.</p>
<a href="#">24-GP1-286</a>	<p>Larry Andrews withdrew his petition 286 based on actions taken on the previous petitions.</p>
<a href="#">24-GP1-218</a>	<p>Leslie Gaunt stated she didn’t think this petition to add an exception for the fossil fuel path was relevant any longer with the removal of the fossil fuel path.</p> <p><b>Motion:</b> Kevin Duell moved to disapprove 218. Gregory Johnson seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-217</a>	<p>Nathan Miller spoke on behalf of the proponent of this petition seeking to clarify the small systems exception and its relationship to the other exceptions, stating that only the temporary systems exception would not count towards the 5 percent threshold for small systems.</p> <p><b>Motion:</b> Duane Jonlin moved to approve 217. Lisa Rosenow seconded the motion.</p> <p>TAG discussion indicated some concerns with the last sentence stating that all other exceptions would count towards the threshold. Duane offered to help</p>

	<p>with a revision to address concerns. Any others interested can email staff or the proponent.</p> <p><b>Motion:</b> Duane Jonlin moved to postpone discussion until the next meeting. Lisa Rosenow seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#"><u>24-GP1-211</u></a>	<p>Nathan Miller spoke on behalf of the proponent for this petition as well. For the low heating capacity exception, it allows a 250 watt appliance, which is the smallest commercially available heater size.</p> <p>Greg Johnson suggested that this be revised to allow a similarly-sized gas heater as well. The TAG also discussed how this exception would work with the semi-heated requirement.</p> <p><b>Motion:</b> Duane Jonlin moved approved as modified. Greg Johnson seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#"><u>24-GP1-207</u></a>	<p>Gary Johnson introduced his petition to add the use of fossil fuel appliances within the exceptions to C403.1.4 and C404.2.1 and the allowable options in Table C503.4.7.</p> <p>Larry Andrews suggested including C403.1.4 exception 9 and removing the reference to heat pump. This was felt by the TAG to be in line with the intent of the proposal. Kevin Duell suggested a simplification of the language in exceptions 6 and 10 in reference to the climate zones, which the TAG also felt was acceptable.</p> <p><b>Motion:</b> Gregory Johnson moved approval as modified as indicated above. Duane Jonlin seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#"><u>24-GP1-243</u></a>	<p>Ben Omura introduced his petition to amend exception 5 to remove the reference to electric resistance heaters for air-to-air heat pump controls. This aligns the control requirements with the previously adopted off-cycle rule.</p> <p><b>Motion:</b> Duane Jonlin moved to approve 243. Kevin Duell seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#"><u>24-GP1-159</u></a>	<p>Carlos Herrera presented his petition adding an exception for parking garage elevator lobbies, allowing outdoor air delivered to the lobby to be tempered. None of the other exceptions adequately address the issue, and ERVs are not a practical solution.</p> <p>Greg Johnson suggested adding an allowance for fossil fuel heaters. The TAG concurred. The TAG discussed a few other language modifications to more closely align with model code protocol and clarity.</p> <p><b>Motion:</b> Duane Jonlin moved to approve 159 as modified, consisting of appropriate references to fossil fuel appliances, changing the word “temper” to “heat” and revising “55 degrees or lower” to “no greater than 55 degrees.”</p>

	Gregory Johnson seconded the motion. The motion carried by voice vote with no opposition.
Section C403.3	
<a href="#">24-GP1-195</a>	<p>Duane Jonlin introduced his petition to clarify that you can use updated equipment efficiency values if they are available instead of the table values.</p> <p>The TAG had some concerns about the wording of the new paragraph, making it look as if this is a requirement for equipment manufacturers.</p> <p><b>Motion:</b> Duane Jonlin moved to approve as modified. Lisa Rosenow seconded the motion. The revision changes the first sentence of the second paragraph to read “Air-to-water heat pump hourly heating output...defrost operation at 32°F shall be reported, in addition...” The motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-222</a>	<p>Nathan Miller presented the petition on behalf of Diana Fisher. The proposal essentially eliminates a double negative in the DOAS table.</p> <p><b>Motion:</b> Kevin Duell moved to approve petition 222. Gregory Johnson seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-271</a>	<p>Duane Jonlin’s next petition decreases the DOAS total fan power from 1 watt to 0.9 watt per cfm. He has been told this still permits almost every fan that has typically been used.</p> <p>The TAG discussed some editorial changes within the section to improve clarity.</p> <p><b>Motion:</b> Lisa Rosenow moved to approve as modified. Duane Jonlin seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-272</a>	<p>Duane Jonlin introduced his petition to add an exception to allow supplemental heating in the ventilation air supply stream for hotel and multifamily occupancies.</p> <p>The TAG discussed how this section is impacted by the exceptions to C403.1.4. They also discussed whether this needed some limitations on how much heating or cooling could be provided.</p> <p><b>Motion:</b> Duane Jonlin moved to approve 272. Greg Johnson seconded the motion. After a brief delay, the motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-231</a>	<p>Jeff Giffin introduced the petition that would allow buildings connected to thermal energy networks to be treated the same as buildings with air source heat pumps.</p> <p><b>Motion:</b> Kevin Duell moved to approve 231. Greg Johnson seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-161</a>	<p>Henry Odum presented his petition to clarify requirements for sizing hot water coils. This future-proofs commercial buildings to allow for any type of equipment or fuel source. Other than some minor language changes, the main</p>

	<p>focus of the proposal is removing exception 4 which helps keep standard sizing runs for fan coils in line with practice.</p> <p>The TAG discussed if this could be achieved by changing the temperature in Exception 4 to something higher.</p> <p><b>Motion:</b> Duane Jonlin moved to approve 161. Luke Howard seconded the motion. The motion carried by voice vote with one opposing vote and one abstention..</p>
<a href="#">24-GP1-241</a>	<p>Ben Omura spoke to his petition 241 to clarify the intent of demand responsive controls. This proposal is based on a Council opinion and instead of specifying a setpoint, it refers you back to Section C403.4.11.4.</p> <p>Kjell Anderson suggested an editorial change to the last sentence for additional clarity.</p> <p><b>Motion:</b> Greg Johnson moved to approve as modified. Duane Jonlin seconded the motion. The motion carried by voice vote with no opposition.</p>
<a href="#">24-GP1-281 /</a> <a href="#">24-GP1-288</a>	<p>Larry Andrews introduced his two petitions to delete the two new sections on humidification, stating that there are better ways to provide humidification and the prohibition of fossil fuels clearly violates I-2066.</p> <p>It was noted that Erik Bedell's petition 298 addresses this same subject and is not on the agenda today. The three should be heard together.</p> <p><b>Motion:</b> Greg Johnson and Kevin Duell moved to table 281 to be heard with 298. The motion carried.</p> <p><b>Motion:</b> Duane Jonlin and Kevin Duell moved to table 288 to be heard with 298. The motion carried.</p>
5. Meeting Schedule	<p>The next meeting will be Friday, March 7, at 8:30am. Kjell stated he plans to cover C406 at that meeting. The March 14 meeting will cover C404 and C405, and he has tentatively scheduled C402 and C407 for March 28. He noted he is trying to get through the bigger items of discussion so there is plenty of time for any necessary workgroups to complete their tasks.</p> <p>Krista noted the March 14 meeting will end earlier to accommodate an MVPE Committee meeting that afternoon.</p>
6. Other Business	None.
7. Adjourn	The meeting was adjourned at 2:05 p.m.