

Public Testimony

2024 WSEC

mod tech error/
don't mod CR102 Editorial omission

Updated
8/27/2026 10:40

Date Received	From	Code	Subject/Summary
8/7/2026	Gregory Johnson, on behalf of the C406 Workgroup	WSEC-C	Cover letter on the results and limitations of the work group report
8/7/2026	Gregory Johnson, on behalf of the C406 Workgroup	WSEC-C	Clarifying, correlating and aligning C403 with C406 modifications
8/7/2026	Gregory Johnson, on behalf of the C406 Workgroup	WSEC-C	Clarifying, correlating and aligning C404 with C406 modifications
8/7/2026	Gregory Johnson, on behalf of the C406 Workgroup	WSEC-C	PNNL work group amendments and credit values for C406
8/7/2026	Eric Vander Mey, as comments on the C406 Workgroup changes	WSEC-C	Comments on C406.1 in relation to C503.6
8/7/2026	Eric Vander Mey	WSEC-C	Replaces the earlier comments sent by Greg Johnson as comments on the PNNL Workgroup changes associated with C406 - Modifications to correlate C503 with C406
8/7/2026	Lisa Rosenow coordination comments on the C406 Workgroup	WSEC-C	Modifications clarifying and coordinating with changes to C406
8/7/2026	Lisa Rosenow coordination comments on C404	WSEC-C	Further modifications clarifying and coordinating C404 based on PNNL work group discussions
8/7/2026	Mike Kennedy, as comments on the C406 Workgroup unfinished business	WSEC-C	Comments regarding C503 issues coordinating with C406 changes
8/7/2026	Mike Kennedy	WSEC-C	Comments regarding C503 issues coordinating with C406 changes
8/7/2026	Mike Kennedy, as comments on the C406 Workgroup unfinished business	WSEC-C	Spreadsheet with alternate credit values for the no heating/cooling/water heating options
8/7/2026	Mike Kennedy	WSEC-C	Alternate values for C406 credit measures for no space heating, cooling or water heating

Date Received	From	Code	Subject/Summary
8/7/2026	Kevin Rose, NEEA	WSEC-R	Documentation for the ERI modeling and modifications to: • Revise the ERI targets with refined values that fix calculation errors and utilize updated modeling • Provide a separate set of targets for homes using on-site renewables • Require an additional 0.5 credit for medium to medium-large homes due to lower than expected energy savings
8/27/2026	Kevin Rose, NEEA	WSEC-R	Missing September 2025 2024 WSEC-R v3 Batch Export for ERI and CO2.xlsx: This is a run of 2024 WSEC homes with the number of bedrooms in the single-family home prototypes ranging from 1 to 8
**	**Form Letter	WSEC	General opposition
7/2/2026	Erik Nelson	WSEC	General opposition
8/7/2026	Dustin Hartlyn	WSEC	General opposition
8/7/2026	Terry Calica	WSEC	Leave our codes as is. Leave our natural gas alone. We voted overwhelmingly for natural gas. We do not need updated energy codes that will drive home owners out of this state or keep builders from building. Thank you. (full text)
7/30/2026	David Lichter	WSEC	Do not adopt or substantially modify the amendments to prioritize energy efficiency without increasing housing costs
8/5/2026	Steven Silvey	WSEC	Do not ban gas
7/30/2026	Dawn McGinnis	WSEC	Please allow natural gas and propane use.
8/7/2026	Kat Bolla	WSEC	Protect energy choice - Remove provisions that penalize or discourage the use of natural gas
8/7/2026	Will Surber	WSEC	Protect energy choice - Remove provisions that penalize or discourage the use of natural gas
**	**Form Letter	WSEC	General support
6/30/2026	Citizens' Climate Lobby	WSEC	General support
7/7/2026	Dylan Plumber, Sierra Club	WSEC	General support 1
8/7/2026	Dylan Plumber, Sierra Club	WSEC	General Support 2
7/14/2026	Ryan Mello, Pierce Co. Executive	WSEC	General Support
7/30/2026	Grace Hope 350 Washington	WSEC	General support
8/7/2026	Elly Claus-McGahan, Climate Pierce County	WSEC	General support

Date Received	From	Code	Subject/Summary
7/30/2026	Janet Nazy, Thurston Co. Climate Action Team	WSEC	General support
7/31/2026	Rebecca Canright	WSEC	General support
8/3/2026	Climate Solutions Letter & Petition	WSEC	General support
8/5/2026	Kristin Lynett, City of Tacoma	WSEC	General Support
8/5/2026	Martin Gibbins, League of Women Voters of Washington	WSEC	General Support
8/5/2026	James C. Moschella, Washington Physicians for Social Responsibility	WSEC	General Support
8/5/2026	350 Washington	WSEC	General Support petition
8/6/2026	Earth Justice	WSEC	General Support petition
8/6/2026	Kristin Edmark	WSEC	General support
8/5/2026	Caitlin Krenn, WA Conservation Action	WSEC	General support + specific support for commercial existing building upgrades and electrification
8/3/2026	Ben Roush, FSI Engineers	WSEC	General Support for both Com & Res + specific support for Com 209 and 263
7/30/2026	Debra Stapel, Hearth & Home	WSEC	Revise the code to avoid compliance penalties based on fuel type, preserve pathways for existing gas-fired appliances, do not adopt electric readiness requirements, give meaningful consideration to the financial impact of these requirements, maintain technology-neutral standards to establish performance goals and let professionals determine the most appropriate equipment

Date Received	From	Code	Subject/Summary
8/3/2026	Danny Steiger, Lumber Traders	WSEC	• Adopt the proposed Energy Rating Index pathway, giving builders greater flexibility to achieve measurable whole-home performance at a lower compliance cost. • Support the proposed reductions to the home-size credit brackets, particularly where they reduce costs for entry-level and mid-sized homes. • Reject or amend proposals that materially increase construction costs, restrict practical design choices, or provide only minimal additional energy savings. • Evaluate proposed requirements according to transparent cost-effectiveness standards, including realistic payback periods and their cumulative effect on the price of a home. • Remove provisions that unnecessarily penalize or discourage natural gas, and preserve reasonable consumer energy choice consistent with the policy direction Washington voters expressed through Initiative 2066. • Consider housing attainability and the risk of unintended environmental consequences as essential parts of the Council's analysis.
8/5/2026	Phil R.	WSEC	General support; maintain strong on-site renewable requirements; do not exempt affordable housing; revise the roof slope exemption
8/5/2026	Phaedra Becket, WASEIA	WSEC-C WSEC-R	Modify or do not adopt C-187 (App B) Modify economic analysis of C-187 (App A) Modify renewable energy credit maximum (App C) Correlate above grade wall U-factor with R-factor (U-0.045) in Table R402.1.2 (App D) Add an envelope backstop to residential ERI (App. E-1) Add a renewable path to the ERI option (App E-2) Add a limitation on renewables in ERI Option (App F)
8/3/2026	Jon Lange, Sunergy Systems	WSEC	Support WASEIA's recommendations
8/5/2026	Anne Shields, Third Act Washington	WSEC	General Support Support WASEIA mods to C-187

Date Received	From	Code	Subject/Summary
8/4/2026	Reeves Clippard, A&R Solar	WSEC	Support WASEIA's recommendations
8/3/2026	Ross Winters, Ecotech Solar	WSEC	Support WASEIA's recommendations
8/4/2026	Manuel Larrian, NW Electric & Solar	WSEC	General Support Support WASEIA mods to C-187
8/4/2026	Anders Alexander, Meta Electric	WSEC	General Support Support WASEIA mods to C-187
8/5/2026	Megan Arora, SolarEdge Technologies	WSEC	General Support Support WASEIA mods to C-187
8/5/2026	Dana Brandt, Ecotech Solar	WSEC	General Support Support WASEIA mods to C-187
8/5/2026	Andy Bourne	WSEC	General Support Support WASEIA mods to C-187
8/5/2026	Lara Worcester, A&R Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Troy Woody, Hot Solar Solutions	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Tim Nelson, Fire Mountain Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Will Sumner, Puget Sound Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Crystal Mossman, Rainshadow Solar & Energy Solutions	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	David C. Campbell, Jr, Cascadia Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Brian Thornberry, Cascadia Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Tessa Ormenyi, Rainshadow Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Morgan Zehrung, Forecast Energy	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Kevin Crowley, Solterra Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Steven Woolpert	WSEC	General Support Support WASEIA mods to C-187

Date Received	From	Code	Subject/Summary
8/6/2026	Paul Hopp, MAD Energy NW	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Carole Elrod, MAD Energy NW	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Rebecca Nash, MAD Energy NW	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Mike Dalton, MAD Energy NW	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Kevin Charap, MAD Energy NW	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Eric Russell, MAD Energy NW	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Andy Schene	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Zach Hoeft, Mary Borstelmann, Greentech Renewables	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Casey Figgins, South Sound Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Jesse Anderson, A & R Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Natasha McKee, A & R Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Rachel Rapp, A & R Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Sara Murphy, A & R Solar	WSEC	General Support Support WASEIA mods to C-187
8/6/2026	Andy Yatteau, A & R Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	T.J. Merrill, A & R Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Michael O'Brien, A&R Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Jennifer Busto, A&R Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Jake Staab, A&R Solar	WSEC	General Support Support WASEIA mods to C-187

Date Received	From	Code	Subject/Summary
8/7/2026	Nicholas Curet, Western Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Trish Merriman, Western Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Eddie Alberton, Mission Solar Energy	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Matt Peters, Blossom Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Aimee Carptenter, Solterra Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Talus Lantz, Western Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Cheryl Beadle, Western solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Kurt Lundquist, Solarsteinn Consulting	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Predrag Bojic, Galaxy Electric & Solar	WSEC	General Support Support WASEIA mods to C-187
8/7/2026	Bill Rudd	WSEC	Support WASEIA mods to C-187
8/7/2026	Christopher Poh, Ecotech Solar	WSEC	Support WASEIA mods to C-187
8/7/2026	Mason Rolph, Olympia Community Solar	WSEC	Support WASEIA comments
8/3/2026	Krista Myers, Cascadia Solar	WSEC-C	Support WASEIA's recommendations
8/3/2026	Ty Chang, Echotech Solar	WSEC-C	Support WASEIA's recommendations
8/3/2026	Alana Nelson, Fire Mountain Solar	WSEC-C	Support WASEIA's recommendations
8/3/2026	Libby Chartier, Echotech Solar	WSEC-C	Support WASEIA's recommendations
8/6/2027	Douglas Hivala, Rotschy	WSEC	Preserve practical like-for-like equipment replacement, maintain technology-neutral and performance-based compliance pathways, revise commercial efficiency-credit requirements, and remove unnecessary electric-readiness mandates that increase costs without providing a corresponding improvement in current building energy performance.

Date Received	From	Code	Subject/Summary
8/6/2026	Nicholas Garcia, WPUDA	WSEC	The final building code revisions must retain the option for home and building owners to use natural gas or propane for space heating and cooking
8/7/2026	Sherrie Jones, Southwest WA Contractors Assoc	WSEC	• Avoid code provisions that prescribe a preferred technology when multiple systems can achieve comparable energy performance • Retain like-for-like equipment replacement • Oppose electric readiness provisions for gas cooking equipment • Address the cumulative cost and constructability impacts • Recalibrate the commercial credit requirements to preserve multiple practical compliance pathways without disproportional regional or building type impacts
8/7/2026	Dennis Schmid, Robertson & Olson Construction	WSEC	Support SWCA comments
8/7/2026	Kelly Fukai, Northwest Gas Association Greg Lane, BIAW Jason Hudson, IBEW Local 77 Kerry Dolan, WA Hospitality Association Jeremy Kliemann, WA Air Conditioning Contractors Assoc Alyn Spector, Cascade Natural Gas Sarah Cottam, Associated Builders & Contractors John Rothlin, Avista Scott Ongley, NW Hearth Patio & Barbecue Assoc Carter Carlson, Associated Builders & Contractors Rod Kauffman, BOMA Matthew Solak, Pacific Propane Gas Assoc	WSEC	Reissue the CR102 and provide a new public comment period

Date Received	From	Code	Subject/Summary
8/7/2026	Kelly Fukai, Northwest Gas Association	WSEC	Consider the cumulative effect of the code Code should be performance based and technology neutral Retain fuel diversity Noted APA concerns with the process Several provisions violate EPCA Proposed code has disproportionate impacts across Washington
8/7/2026	Kelly Fukai, Northwest Gas Association	WSEC	Various provisions that violate EPCA in both residential and commercial codes
8/7/2026	Kelly Fukai, NW Gas Association	WSEC	• Recognize advanced hybrid HVAC and water-heating systems as preferred high performance technologies within the Energy Code. • Remove compliance provisions that unnecessarily disadvantage hybrid systems where equivalent building energy performance can be demonstrated. • Maintain technology-neutral performance standards that encourage innovation rather than prescribing fuel choices. • Incorporate consideration of regional resource adequacy, peak electric demand, resilience, and integrated gas-electric planning into future code development. • Direct future PNNL Technical Advisory Group work to develop objective performance metrics and compliance pathways for advanced hybrid technologies and intelligent controls.

Date Received	From	Code	Subject/Summary
8/7/2026	Senator Shelly Short Rep. Suzanne Schmidt Senator Leonard Christian Senator Drew MacEwan Senator Keith Wagoner Rep. Deb Manjarrez Rep. Mike Steele Senator Judy Warnick Senator Phil Fortunato Senator Ron Muzzall Senator Paul Harris Rep. Mark Klicker Rep. Mike Volz Rep. John Ley Rep. Chris Corry Rep. Cyndy Jacobsen Rep. Michelle Valdez Rep. Stephanie Barnard Senator Nikki Torres Rep. Brian Burnett Senator Keith Goehne Rep. Andrew Engell Rep. Skyler Rude Rep. Jim Walsh Senator Mark Schoesler Rep. Travis Couture Rep. Ed Orcutt Senator Perry Dozier Senator John Braun Rep. April Connors Senator Jeff Wilson Rep. Sam Low Rep. Kevin Waters	WSEC -C WSEC-R	Retain like-for-like equipment replacement Oppose electric readiness provisions Award credits based on performance not fuel type Convert H/ERV mandate in CZ 5 to an R406 credit option Oppose the 15% window area cap in the component performance pathway Oppose roof solar reflectance requirements Only require as many R-2 credits as needed to meet the statutory goal for this cycle Allow hybrid service water heating systems Oppose the requirement for 20% of fenestration to be triple glazed Oppose C-264 and C-256 Reevaluate TSPR requirements Oppose Clean Building Performance Standard documentation requirements Reexamine possible EPCA preemptions with replacement equipment and credit penalization for gas or dual fuel systems Refile the CR102 for the commercial energy code to preserve a fair, inclusive and transparent process
8/5/2026	Deepa Sivarajan, Climate Solutions	WSEC-C WSEC-R	General support; Support of res petitions 019, 018 and com petitions 209, 263, 270, 267
8/5/2026	Donna Albert	WSEC-C WSEC-R	General support. Support WASEIA modifications. Supports Kjell's modifications. Supports C-264. Supports LPA as proposed in the CR102.

Date Received	From	Code	Subject/Summary
8/7/2026	Stacy Martin, WA & N ID District Council of Laborers	WSEC-C WSEC-R	• Revise the Commercial Energy Credit requirements to eliminate the disproportionate compliance burden currently placed on Eastern Washington projects. • Remove mandates and penalties (including 24-RE-19, 24-GP1-209, 24-GP1-267, 24-GP1-270, 24-RE-015, and 24-GP1-268) that eliminate or penalize the use of federally compliant natural gas equipment based on fuel type rather than measured energy performance. • Deny proposals 24-GP-264R and 24-GP-256, and preserve CMU block as a qualifying mass wall assembly. • Withdraw the current CR-102 and reissue a complete proposal with a new public comment period, consistent with RCW 34.05.320, .325, and .340.
8/7/2026	Greg Hesler, Avista Lucas Hamilton, MDU Resources Group Megan Berge, NW Natural	WSEC-C WSEC-R	Do not adopt fuel switching mandates in R503 and C503 Do not adopt the fuel-discriminatory credit tables in R406 and C506 Do not adopt the electric readiness mandates Defer any decisions that may conflict with I-2066 until resolved by the courts Do not finalize the C406 credit values, R408 ERI targets or R405 performance targets until PNNL completes the work, the Council publishes the results, an independent analyst evaluates them, and the public comments Adopt a technology-neutral code based on site energy
8/5/2026	Sarah Cottam, Assoc. Builders & Contractors, Inland Pacific Chapter	WSEC-C WSEC-R	Oppose R-019 to require HP when replacing AC Oppose R-038 to require H/ERV in CA 5 Oppose fuel-based penalties for energy credits in R406 Support ERI and whole building compliance methods Oppose the disproportionate CZ5 burden in C406 Oppose the removal of like-for-like replacement of HVAC and WH Oppose electric readiness provisions Oppose C-264 and C256 Preserve fuel choice for equipment Require a usability review of code before implementation

Date Received	From	Code	Subject/Summary
8/3/2026	Mitchell Kahn, City of Bellingham	WSEC-C WSEC-R	Instead of counting on Chapter 5 to modify code written for entirely different types of projects (new builds vs additions, alterations and repairs), work towards developing a parallel energy code specifically for AA&R
8/5/2026	Josie Cummings, Washington Realtors	WSEC-C WSEC-R	Oppose the elimination of like-for-like equipment Oppose fuel-based penalties in R406 & C406 Oppose costly code barriers to commercial to residential conversion Need for code relief for wildfire victims
8/5/2026	Gregory Johnson, Avista	WSEC-C WSEC-R	Modification to allow AJH to amend the code during natural disaster
8/6/2026	Gregory Johnson, Avista	WSEC-C WSEC-R	Oppose the changes regarding like-for-lie replacement of equipment in R506/C503
8/7/2026	Alessandra de la Torre, NW Energy Coalition	WSEC-C WSEC-R	General Support Support C-209 and R-019 encouraging AC replacements to be HP Support C-267 and C-270 that incentivizes replacing HVAC & WH equipment with HP
8/7/2026	Luke Howard, Nick Manning, Dept of Commerce	WSEC-C WSEC-R	General Support Specific Support for C-267, C-270, R-019, R018 for replacement equipment
8/7/2026	Luke Howard, Nick Manning, Dept of Commerce	WSEC-C WSEC-R	General Support Specific support for C-209 and R-019 AC to HP replacement Specific support for C-267, C-270, C268 High performance equipment replacement Specific Support for C-263, R-018 electric readiness

Date Received	From	Code	Subject/Summary
8/7/2026	Rachel Koller, Shift Zero Kjell Anderson, LMN Poppy Storm, 2050 Institute Phaedra Beckert, WASEIA Tony Usibelli, Usibelli Consulting David Reddy, O'Brien360 Gavin Tenold, NW Renewables Ben Roush, FSi Engineers Dylan Plummer, Sierra Club Reeves Clippard, A&R Solar Markus Virta, Cascade Renewables Nancy Henderson, ArchEcology Jovan Ludovice, Bellwether Housing	WSEC-C WSEC-R	Revise C411 for clarity and consistency Eliminate the affordable housing exemption for renewable energy in C411 Revise the roof slope exemption in C411 Revise the renewable energy credit in R406 to include the Tenold/Johnson modification
8/7/2026	Kelly Fukai, Northwest Gas Association	WSEC-C WSEC-R	Retain like-for-like equipment replacement Remove penalties for fuel choice Remove electric readiness requirements Revise provisions on commercial cooking equipment, commercial water heating, and masonry wall construction
6/26/2026	Steve Belzak, NW Concrete Masonry Assoc.	WSEC-C	Oppose 24-GP1-264 changes to Tables C402.1.3/C402.1.4 CMU block exceptions and retain the existing 2021 language
7/14/2026	NEEA	WSEC-C	Modify the FEI to a uniform requirement of greater than or equal to 1.05 for all classes and remove Table C403.8.3. Add a requirement that FEI be listed on construction documents.
6/12/2026	Annette Ademasu, City of Shoreline	WSEC-C	Modification of residential construction to: ■Not require continuous exterior insulation ■Add in credit options for trees, pervious surfaces, energy star appliances ■Prohibit GHG emitting sources such as natural gas and heating oil

Date Received	From	Code	Subject/Summary
7/28/2026	Jeremy Kliemann, Kliemann Brothers Heating and Air	WSEC-C	• Revise C503.4.4.1, C503.4.7, and C503.5 to preserve practical replacement options and avoid added electrical, engineering, and compliance cost • Remove fuel-based penalties and unnecessary electric-readiness costs; use performance-neutral requirements
7/29/2026	Kerry Dolan, WA Hospitality Assoc	WSEC-C	■ Do not adopt amendment requiring operators to replace fully functioning units with new water heating systems (24-GP1-270 , C503.5?) ■ Remove electric readiness requirements for commercial natural gas cooking appliances (24-GP1-263, C405.15.1) ■ Remove Energy Star mandate for commercial cooking appliances (24-GP1-173, C405.15) ■ Do not require 100% of calculated water demand to be supplied by heat pump water heaters (24-GP1-268, C404.2.1.1.1)
7/30/2026	Aaron McCabe	WSEC-C	■ Equalize or reduce the commercial credit requirements so Eastern Washington is not forced to meet a higher credit burden than Western Washington for comparable occupancies. • Provide a clear justification for each regional difference in Table C406.1 and explain why a less burdensome alternative was not selected. • Reconsider provisions that add unnecessary cost and complexity to HVAC replacement projects, including added electrical, engineering, envelope, and scheduling impacts. • Reevaluate region-specific residential ventilation mandates where the cost-benefit case for households is not clearly positive. ■ Preserve performance-based and technology-neutral compliance pathways that allow practical solutions, competition, and fuel choice. • Preserve performance-based and technology-neutral compliance pathways that allow practical solutions, competition, and fuel choice

Date Received	From	Code	Subject/Summary		
7/31/2026	Lisa Vatske, Washington State Housing Finance Commission	WSEC-C	Remove exception 2 to Section C411.1, which would exempt affordable housing from the on-site renewable requirements. If exception 3.5 is retained, the Commission is willing to steward the funds received.		
7/31/2026	Juergen Oswald, Renaissance Seattle Hotel	WSEC-C	■ Restore like-for-like replacement of existing HVAC and water heating equipment during renovations and equipment failures • Revise the commercial energy credit requirements so they meet legislative energy efficiency goals without imposing unnecessary costs or favoring specific technologies • Remove the penalty for natural gas supplemental heat and evaluate systems based on actual energy performance • Preserve multiple technology pathways that allow businesses to comply with the energy code while meeting their operational needs		
8/2/2026	Lisa Rosenow, Evergreen Technology	WSEC-C	Modifications to: • Relocate Section C401.2.3 to an as-yet undecided location within the specific requirements section • Clarify Section C402.1 and correct section reference • Editorial corrections to subsections of C402.1		
8/3/2026	Mark McGinley, University of Louisville	WSEC-C	Oppose 24-GP1-264 changes to Tables C402.1.3/C402.1.4 CMU block exceptions and retain the existing 2021 language		
7/7/2026	Lowell Glodowski, Bricklayers and Allied Craftworkers Local 1	WSEC-C	Oppose 264 and 256		
8/3/2026	Ron Adams	WSEC-C	Oppose 264 and 256		
8/4/2026	Kevin Brown, Columbia Machine	WSEC-C	Oppose 264 and 256		
8/4/2026	Bruce Corigliano, White Block Co	WSEC-C	Oppose 264 and 256		
8/4/2026	Steve Belzak, NW Concrete Masonry Assoc.	WSEC-C	Oppose 264 and 256		
8/5/2026	Lionel Lemay, Pacific NW Building Resilience Coalition	WSEC-C	Oppose 264 and 256		
8/4/2026	William Larson, Pacific NW Building Resilience Coalition	WSEC-C	Oppose 264 and 256		

Date Received	From	Code	Subject/Summary
8/5/2026	Josh Hammer, Willamette Graystone Best Block	WSEC-C	Oppose 264
8/5/2026	Martha VanGeem	WSEC-C	Oppose 264
8/5/2026	Angela Henderson	WSEC-C	Oppose 264 and 256
8/5/2026	Nicholas Lang, CMHA	WSEC-C	Oppose 264 and 256
8/5/2026	Lukas Witkowski	WSEC-C	Oppose 264 and 256
8/5/2026	Tom Young	WSEC-C	Oppose 264 and 256
8/6/2026	Gunnar Elopson, Great Northern Masonry	WSEC-C	Oppose 264 and 256
8/6/2026	Richard Crooks, WA State Conference of Mason Contractors	WSEC-C	Oppose 264 and 256
8/6/2026	Jake Spilker, Spilker Masonry	WSEC-C	Oppose 264 and 256
8/6/2026	Chud Wendle, Hutton Settlement Children's Home	WSEC-C	Oppose 264 and 256
8/6/2026	Mary Miller, Greater Spokane Inc.	WSEC-C	Oppose 264 and 256
8/6/2026	Jon Budda, R&R Masonry	WSEC-C	Oppose C-264
8/7/2026	Lowell Glodowski, Western WA Masonry Trades Apprenticeship & Training	WSEC-C	Oppose 264 and 256
8/7/2026	Cole Cabler, International Masonry Institute	WSEC-C	Oppose C-264
8/7/2026	Adam Hutchinson, Northwest Masonry Institute	WSEC-C	Oppose 264 and 256
8/7/2026	Mark Streuli, WA Masonry-Tile Labor-Management Cooperation Committee	WSEC-C	Oppose C-264
8/7/2026	Kevin Aldridge, Basalite Concrete Products	WSEC-C	Oppose 264 and 256
8/7/2026	Derek Jones, White Block Company	WSEC-C	Oppose C-264
8/7/2026	Duane Jonlin	WSEC-C	Support for C-264, eliminating the CMU wall exemption

Date Received	From	Code	Subject/Summary
8/3/2026	Lisa Rosenow, Evergreen Technology	WSEC-C	Improvements to the CR102 as follows: 1. Distinguish relocation from revision throughout the document. Where a provision or table is moved, indicate the move by an editor's note versus full strike-through of the old location and fully underlining the new location. In the new location, use the standard conventions of strike-through and underlining to show actual language modifications. 2. Verify that all proposed modifications are clearly marked, including table updates. 3. Provide a companion redline document that compares the 2024 draft against the 2021 adopted code, so reviewers can precisely see what changed without reconstructing the comparison themselves.
8/4/2026	Heather Kurtenbach, Wa Building Construction Trades Council	WSEC-C	Please withdraw and reissue the CR102 for the commercial energy code with a new public comment period to ensure thorough public review of all provisions
8/4/2026	Zac Johnson, Heating Air-Conditioning Refrigeration Distributors International	WSEC-C	Oppose C-209 to require HP when replacing AC Oppose C-267 that eliminates like-for-like replacement of heating equipment Oppose C-270 that eliminates like-for-like replacement of water heaters Oppose C-268 that increases the required sizing of a primary heat pump water heater from 50 percent to 100 percent of peak service demand
8/4/2026	Drew Zaborowski	WSEC-C	Request a pause in energy code changes until the 2021 changes can be meaningfully evaluated and market conditions allow for such a change.
8/4/2026	Lisa Rosenow, Evergreen Technology	WSEC-C	• Add the word "service" to the title of Table C404.2 and reomove the last sentence of Section C404.2 for clarity. • In C404.2.1.1.2 move the requirements from 24-GP1-253 into Item 3. • In Section C404.6.1, add requirements from 2021 code into the model code 2024 language to retain stringency. • Add missing language from 224-GP1-236 to Sections C404.3 and C404.5.

Date Received	From	Code	Subject/Summary
8/5/2026	Kjell Anderson	WSEC-C	Eliminate credit options for no space heating, cooling or water heating
8/6/2026	Carter Carlson, Associated Builders and Contractors	WSEC-C	Modify Table C406.1 to maintain technology neutral compliance pathways
8/6/2026	Lisa Rosenow, Evergreen Technology	WSEC-C	• Reinstate SHGC calculations in Section C402.1.5.2 for the component performance method • Correct various typos in Chapter 2 • Correlate Green Retail Tariff/Renewable Energy Certificate/Renewable Thermal Certificate and Physical Renewable Energy Power Purchase Agreement/Renewable Energy Purchase Agreement from C-181 • Update various section references within C402 • Correct missing or incorrect values and footnotes in envelope tables and revise layout of mass wall assembly types • Rearrange subsections under C402.2.1 to be grouped more logically • Update footnote d in Tables C404.2 and C402.4.1.1.2 with approved modification from C-176 • Revise C408.1 for clarity and correlation with C-149 • Update C408.1.4.1 to correlate with new terminology • Add missing language from C-266 to C408.1.4.1.1 • Revise language in C410.3
8/6/2026	Chris Siemens, Mustard Seed	WSEC-C	• Pause adoption of provisions that mandate or effectively force premature electrification of restaurant and hotel systems. • Restore durable like-for-like and hybrid replacement pathways for existing buildings. • Adopt broad, objective technical-infeasibility and electrical-capacity exceptions. • Provide cuisine-, capacity-, and availability-based exceptions for commercial food-service equipment. • Conduct a cumulative affordability analysis that includes rents, home prices, wages, business closures, and lost employee hours—not only 50-year modeled energy savings

Date Received	From	Code	Subject/Summary			
8/6/2026	Carolyn Logue, WA ACCA	WSEC-C	• Retain the like-for-like replacement of equipment • Retain the existing 50% sizing requirement in Section C404.2.1.1.1 rather than increasing it to 100% • Do not require additional credits in C406 for Eastern Washington • Complete the rule and cost analysis before refiling the CR102			
8/6/2026	Gregory Johnson, Avista	WSEC-C	Oppose impediments to gas cooking appliances			
8/6/2026	Gregory Johnson, Avista	WSEC-C	Reduce the credit requirements in Table C406.1, especially as pertains to Eastern WA; remove requirements for credits for alterations			
8/6/2026	Matthew Solak, Pacific Propane	WSEC-C	• Retain like-for-like equipment replacement • Oppose electric readiness provisions for gas cooking equipment • The credit system should focus on increasing energy performance and not push the market towards a preferred technology			
8/6/2026	Mike Fowler	WSEC-C	Modify C-258 to assign credit values for peak heating and cooling load control, move the credit measure to a more suitable location, and make corrections in C406.2.22 and C406.3.8			
8/7/2026	Randy Sprout, Clean Energy Innovators	WSEC-C	Variation of WASEIA form letter Support the reduction in size threshold for solar Support the increase in base solar requirement Oppose the pitched roof exclusion Oppose the payment in lieu of solar option Oppose the affordable housing exception for solar			
8/7/2026	Will MacArthur, A&R Solar	WSEC-C	Oppose the affordable housing exemption from the solar requirements Oppose the exemption of roof slopes above 2:12 from the solar requirements			

Date Received	From	Code	Subject/Summary
8/7/2026	Lisa Rosenow, Evergreen Technology	WSEC-C	Additional sections in C404, including a correction to a previous public comment Misc. section recommendations within C406
8/7/2026	Amanda Lo, BEE Engineers	WSEC-C	Recommend that Exceptions 3.3, 3.3.1, and 3.3.2 be separated from Exception 3 and established as independent exceptions to Section C411.1 so they may be applied regardless of available roof area
8/7/2026	Rachel Koller, Shift Zero Jason Acosta, RDH Bldg Science David Reddy, O'Brien360 Mindy Black, Bellwether Housing Kimberly Loewen, Elevate Nancy Henderson, ArchEcology Gavin Tenold, NW Renewables Emily Thompson, GMD Development Hans Rasmussen, Tsuga Studio	WSEC-C	Affordability modifications to C402.4 (C-176) High performance glazing requirement and C402.1.2.3 mechanical penetrations
8/7/2026	Patrick Hanks, BIAW	WSEC-C	Set additional credit targets for the R-2 occupancy at the minimum amount needed to meet the statutory goal for this cycle Do not adopt or amend any provisions that discourage, penalize or prohibit the use of gas
8/7/2026	Amelia Kolb, Fire Mountain Solar	WSEC-C	Revise the roof slope exemption in C411 so viable rooftop solar projects are not unnecessarily excluded Do not adopt the payment in lieu of solar exemption
8/7/2026	Yanni Psareas, RNG Coalition	WSEC-C	Oppose C-181 changes to renewable energy use in C411
8/7/2026	Duane Jonlin	WSEC-C	Support for C-176, triple glazing for 20% of fenestration
8/7/2026	Duane Jonlin	WSEC-C	Support for C174 and C-269, pipe sizing and insulation
8/7/2026	Duane Jonlin	WSEC-C	Support for C267 and C270, high performance replacement equipment
8/7/2026	Duane Jonlin	WSEC-C	Support for C173 and C-263, commercial kitchen appliances and electric readiness
8/7/2026	Duane Jonlin	WSEC-C	Support for C-234, lighting power allowance reduction
8/7/2026	Duane Jonlin	WSEC-C	Oppose C-087, amending the definition of mass transfer deck slab

Date Received	From	Code	Subject/Summary
8/7/2026	Duane Jonlin	WSEC-C	Support for C-209, requiring rooftop unit to be replaced with heat pump when replaced
8/7/2026	Duane Jonlin	WSEC-C	Supporting C-265, energy modeling envelope backstop at 10% max
8/7/2026	Mike Kennedy	WSEC-C	Numerous comments, clarifications and typos throughout the commercial code
8/7/2026	Carter Nelson, Danielle Duvall, Commercial Real Estate Development Assoc of Washington	WSEC-C	Further examination of the impact of I-2066 on the 2021 code is necessary before implementing new requirements. Concerns regarding the cost benefits of the proposed changes. Concerns that the utility infrastructure is lacking.
8/7/2026	Ken Short, Associate of Washington Business	WSEC-C	Concerns about several of the proposals which go well beyond enhancing building energy performance and instead impose considerable new financial and operational costs on employers across the state: • The elimination of like-for-like replacement • Credit requirements that go beyond the goal to meet the statutory mandate • Credit penalty for natural gas supplemental heat • Unnecessary electric readiness mandates
8/7/2026	Ben Omura	WSEC-C	Modification to C-100, Section C403.1.4 exceptions 2 and 8
8/7/2026	Jessica Clawson, McCullough Hill	WSEC-C	• Oppose C-268 increasing the sizing requirements for HP water heating • Oppose electrification requirements • Concerns regarding new thermal bridging and envelope requirements • R-27 insulation required for wood framed walls is not commonly available • Oppose C-176 requirements for 20% of fenestration to be triple glazed products
8/7/2026	Andy Burnham	WSEC-C	Modifications to C407.3.1 (to allow a greater than 10% higher UA in some cases), C503.4.7, and C503.5 (adding an exception and criteria for replacing failing water & space heating equipment)



Date Received	From	Code	Subject/Summary
8/7/2026	D. Scott Peterson on behalf of Washington labor unions, employers, workers manufacturers, commercial property owners, retailers, restaurants, hotels, contractors, builders, industry associations, agricultural businesses, healthcare providers, and other organizations committed to maintaining a balanced, affordable, and competitive commercial energy code	WSEC-C	• Restore like-for-like replacement of equipment • Revise the energy credit requirements so they achieve legislative efficiency goals without imposing disproportionate costs or favoring specific technologies • Remove penalties that disadvantage natural gas supplemental heating or other federally compliant equipment • Eliminate electric readiness mandates • Preserve multiple technology pathways that allow businesses to comply with performance standards while selecting equipment appropriate for their operators • Maintain a technology neutral commercial energy code • Protect the use of CMU walls by denying C-264 and C-256
8/7/2026	Rod Kauffman, BOMA	WSEC-C	The timing and the costs associated with many aspects of the proposals in CR-102 should consider the perspectives of the commercial real estate market today. We are not advocating against the ultimate goals, but rather their timing and depth in the context of today's market realities Several CR-102 proposals would require major electrical upgrades, redesigned mechanical systems, expanded engineering, additional permitting and significantly larger capital expenditures simply to replace existing equipment let alone the costs of state and local clean building mandates
8/7/2026	Kevin Rose, NEEA	WSEC-C	Modifications to C404.2.1.2 for dual-fuel heat pump water heaters
8/7/2026	Kevin Rose, NEEA	WSEC-C	Modification to correlate occupant sensor control for lighting in bathrooms with national codes
8/7/2026	Kevin Rose, NEEA	WSEC-C	Update of Building Performance Factors based on PNNL analysis of prescriptive changes for 2024 WSEC Correcting the cooling and heating COP in the TSPR standard reference design

Date Received	From	Code	Subject/Summary
8/7/2026	David Reddy, O'Brien360	WSEC-C	• Support changes to C402.1.2.3 regarding mechanical penetrations for heat pumps • Support changes to C411, including modifications from Shift Zero and WASEIA • Support the modification to C402.4 to provide an exemption for multifamily if the total window to wall remains below 30% • Support the modifications from Mike Kennedy in C406 for credit values for no space heating, cooling or water heating • Support the modifications to C407 building performance factors and site energy performance targets • Recommend deletion of C404.2.1.1 regarding heat pump water heating sizing • Recommend reconvening the TAG to review substantive comments and refile of both the commercial and residential CR102 with recommended changes • Modify C402.2.4 to reference the slab configuration in Appendix CA for consistency • Modify Table C402.1.2 to provide a C-factor rather than U-factor for below grade walls for consistency with ASHRAE 90.1 • Modify C402.1.4 equation 1 to eliminate duplicative calculations of thermal bridging • Modify C402.6 to eliminate a loophole that disregards floor and roof thermal bridging caused by beams and columns • Modify Table C402.1.4 to scale Chi-factors for larger columns
12/30/2025	Jonathan Jones, WSU	WSEC-R	Table R402.1.2 modifications: Update the ceiling U-factor to 0.25 and the wall U-factor to 0.45
7/22/2026	Shawn Mullins, Owens Corning	WSEC-R	Modify R303.1.1.2 to include other than BIB insulation and allow alternate means of testing density, and recording the test results. Modify Table R402.5.1.1 Cavity Insulation Installation to remove language on fitting insulation around obstructions and on face stapling (existing 2021 language, not modified for 2024) Modify Section R403.3.5.1.1 to allow for UA increase if the surrounding insulation is greater than R-30.

Date Received	From	Code	Subject/Summary
6/12/2026	Annette Ademasu, City of Shoreline	WSEC-R	Modification of residential construction to: ■ Not require continuous exterior insulation ■ Add in credit options for trees, pervious surfaces, energy star appliances ■ Prohibit GHG emitting sources such as natural gas and heating oil
7/28/2026	Jeremy Kliemann, Kliemann Brothers Heating and Air	WSEC-R	• Revise R503.1.2.5 so a residential air-conditioner replacement does not require a heat-pump conversion or unrelated envelope work • Correct Table R406.2 so dual-fuel systems are credited according to measured energy performance • Remove fuel-based penalties and unnecessary electric-readiness costs; use performance-neutral requirement • Retain flexible compliance tools such as the ERI pathway
7/30/2026	Nicole McKernan, Board and Vellum	WSEC-R	Revise Energy Credit 3.2 for clarity in regards to hybrid HVAC systems; add credit for high efficiency boilers; Clarify Table R402.1.3 to specify if the values are referring to standard, intermediate or advanced framing.
7/30/2026	Nicole McKernan Part 2, Board and Vellum	WSEC-R	Fix an error in the footnotes for option 3.11--it should reference option 3.2, not 3.3 We disagree that the new language on duct sizing and layout from 012 would not have a cost associated Please consider allowing a deviation or exception when converting existing below grade spaces to conditioned spaces where a furred basement wall would reduce required egress widths Consider reducing the number of credits needed for large dwellings, especially where solar is not an option
7/30/2026	Jonathan Jones, WSU	WSEC-R	Revise Table R406.3(2) to reflect the associated fuel normalization credit each option aligns with



Date Received	From	Code	Subject/Summary
7/30/2026	Jonathan Jones, WSU	WSEC-R	Revise table R402.1.3 footnote f to align with R402.2.1
7/30/2026	Jonathan Jones, WSU	WSEC-R	Better align new Appendix RF and modified Appendix CA
7/30/2026	Jonathan Jones, WSU	WSEC-R	Revise Table R402.1.3 to align U-values
8/4/2026	Zac Johnson, Heating Air-Conditioning Refrigeration Distributors International	WSEC-R	Oppose R-019 to require HP when replacing AC Provide the same base credit for System Type 2 and 4 in R406.2 Oppose R-018 electric readiness proposal
8/5/2026	Drew Shawver	WSEC-R	Oppose the requirement of U-0.27 windows Oppose the graduated credit requirement without expansion of the credit menu Oppose the requirement for exterior insulation on re-siding or alteration projects Oppose the requirement of providing the full duct design and sizing at permit Disagree with the cost benefit analysis statement that this does not impose more than minor costs
8/5/2026	Jeff Fogarty	WSEC-R	Do not restrict gas
8/5/2026	Jim Lazar	WSEC-R	General support
8/5/2026	Leann Crist	WSEC-R	Oppose the inclusion of duct size and layout in the permitting documents (part of R-012) Oppose continuous insulation required when siding is replaced

Date Received	From	Code	Subject/Summary		
8/5/2026	Greg Shiffler, SHED	WSEC-R	Oppose the following changes that increase cost with only marginal energy savings: R105.2 duct specifications on permit docs, R503.1.1.3 continuous insulation for residing, R403.3.5 R-19 duct insulation required below ducts in unconditioned space, R406 higher energy credit requirements for dwellings		
8/7/2026	Phaedra Becket, WASEIA	WSEC-R	Revision of the ERI with renewables pathway (envelope backstop is the same as that submitted on Aug. 5)		
8/6/2026	Juliette Dubroca	WSEC-R	Oppose the following changes: R105.2 duct specifications on permit docs, R503.1.1.3 continuous insulation for residing		
8/6/2026	Neal Andrew Barber, Studio Nocturne	WSEC-R	Oppose the following changes: R105.2 duct specifications on permit docs, R503.1.1.3 continuous insulation for residing, changing the window U-factor to 0.27, adoption of Appendix RF and the changes to Appendix CA means that R-21 intermediate framed walls will no longer meet the threshold		
8/6/2026	Gordon Hester, Kiemle Hagood	WSEC-R	Oppose the inclusion of a 15% cap on glazing in the UA equation Oppose the requirement of H/ERV in CZ5 Oppose fuel based penalties in R406		
8/6/2026	Adam Gage, NEEA	WSEC-R	Request modifications to update the NEEA Advance water heating specifications to latest edition; add "or equivalent" to every reference to meeting the NEEA standard; modify energy credit option 5.7 to align with the R-2 split system requirements		
8/6/2026	Michael Brasgalla, Azure Northwest	WSEC-R	Oppose the change in window U-factor to U-0.27; oppose the change in leakage rate from 4.0 to 3.0 ACH; oppose the requirement for H/ERV in CZ5; oppose limiting the smart thermostat credit to gas furnaces only; oppose the increasing reliance on solar in R406; no credit path, or path at all, for advanced framing; support the addition of ERI		

Date Received	From	Code	Subject/Summary
8/6/2026	Christian Welch, Azure Northwest	WSEC-R	Oppose the change in window U-factor to U-0.27; oppose the change in leakage rate from 4.0 to 3.0 ACH; oppose the requirement for H/ERV in CZ5; oppose limiting the smart thermostat credit to gas furnaces only; oppose the increasing reliance on solar in R406; no credit path, or path at all, for advanced framing; support the addition of ERI
8/7/2026	Regina Collins, Azure Northwest	WSEC-R	Oppose the change in window U-factor to U-0.27; oppose the change in leakage rate from 4.0 to 3.0 ACH; oppose the requirement for H/ERV in CZ5; oppose limiting the smart thermostat credit to gas furnaces only; oppose the increasing reliance on solar in R406; no credit path, or path at all, for advanced framing; support the addition of ERI
8/7/2026	Josh Stevens, Azure Northwest	WSEC-R	Oppose the change in window U-factor to U-0.27; oppose the change in leakage rate from 4.0 to 3.0 ACH; oppose the requirement for H/ERV in CZ5; oppose limiting the smart thermostat credit to gas furnaces only; oppose the increasing reliance on solar in R406; no credit path, or path at all, for advanced framing; support the addition of ERI
8/6/2026	Carolyn Logue, WA ACCA	WSEC-R	• Oppose R503.1.2.5 requiring a residential air-conditioner replacement to be a heat-pump • Correct Table R406.2 so dual-fuel systems are credited according to measured energy performance • Oppose mandatory H/ERV in CZ 5 • Oppose electrification • Retain flexible compliance tools such as the ERI pathway
8/6/2026	Gregory Johnson, Avista	WSEC-R	Modification to R408 addressing battery storage
8/6/2026	Gregory Johnson, Avista	WSEC-R	Modifications to correct error in Table R406.2 (see p. 5)
8/6/2026	Matthew Solak, Pacific Propane	WSEC-R	• Oppose R503.1.2.5 requiring a residential air-conditioner replacement to be a heat-pump • Correct Table R406.2 so dual-fuel systems are credited according to measured energy performance • Oppose electrification

Date Received	From	Code	Subject/Summary
8/6/2026	Laura Padden	WSEC-R	Support the addition of the ERI pathway Support the new home size distribution for R406 Oppose the H/ERV requirement for CZ 5 Oppose the electric readiness provisions Remove any penalties for the use of natural gas
8/6/2026	Alan Nolan	WSEC-R	Oppose the mandatory H/ERV requirement for CZ5 Oppose the electric readiness provisions Support the addition of the ERI pathway Support the new home size credit distribution for R406
8/6/2026	Anne Anderson, Green Mountain Engineering	WSEC-R	Retain the 0.056 U-factor for above grade walls
8/6/2026	Anne Anderson, Green Mountain Engineering	WSEC-R	Oppose electric readiness (R-018)
8/6/2026	Anne Anderson, Green Mountain Engineering	WSEC-R	Oppose the 15% glazing cap in UA path
8/6/2026	Anne Anderson, Green Mountain Engineering	WSEC-R	Oppose the U-0.27 window requirement (R-036)
8/7/2026	Dylan Sluder, Master Builders Assoc of King and Snohomish Counties	WSEC-R	Support the addition of the ERI pathway Support the new home size distribution for R406 Revise the window U-factor to 0.28 rather than 0.27 Oppose the 15% glazing cap for component performance Revise the proposed air leakage provisions to include the model code alternative calcs for multifamily Oppose the new solar reflectance requirements Move the H/ERV requirement for CZ5 to a credit option rather than mandatory Oppose the electric readiness requirements Oppose the requirement for AC replacement to be a heat pump Establish fuel-neutral energy performance standards Do not discourage or penalize lawful energy sources
8/7/2026	Sara Emhoff, Board & Vellum	WSEC-R	Oppose R503.1.1.3 requiring continuous insulation when siding is replaced
8/7/2026	Jeff Pelletier, Board & Vellum	WSEC-R	Oppose R503.1.1.3 requiring continuous insulation when siding is replaced
8/7/2026	Yi-Chun Lin, Board & Vellum	WSEC-R	Oppose R503.1.1.3 requiring continuous insulation when siding is replaced

Date Received	From	Code	Subject/Summary
8/7/2026	Mike Moore, Stator	WSEC-R	In support of R-038 H/ERV, with suggested changes to the preliminary CBA
8/7/2026	Jim van Loben Sels	WSEC-R	Concerns regarding the increasing cost of building a home
8/7/2026	Mike Kennedy	WSEC-R	Allow Tables R402.1.2 and R402.1.3 to be used interchangeably Oppose the changes for air leakage tester training Oppose the air leakage change to 3 ACH Questionable point values for R406 Items 1.3 and 1.4 Editorial changes for R406 Items 2.1 and 2.2
8/7/2026	Patrick Hanks, BIAW	WSEC-R	Support: new home size brackets for R406; ERI pathway Oppose: 15% cap on window area in component performance pathway; roof solar reflectance; BIB insulation testing; electric readiness; replacing AC with heat pump Amend: window U-factor to 0.28 rather than 0.27; air leakage rate to use the 2024 IECC alternative options for single family 1500 sf or less; revert to 2021 WSEC option 4.1 for ducting in Table R406.3(2)
8/7/2026	Tracy Doriot, Doriot Construction	WSEC-R	Adopt ERI pathway Adopt the new home size bracket for R406 Amend the window U-factor to 0.28 Oppose the 15% window area cap Amend the air leakage rate as proposed by BIAW Oppose the roof solar reflectance requirement Amend the CZ 5 H/ERV requirement to a credit option instead Oppose the electric readiness requirement Preserve Table R406.3(2) Option 4.1 for ducted HVAC systems Oppose the heat pump requirement when replacing AC Establish fuel neutral energ performance standards Do not adopt or amend any provisions that discourage, penalize or prohibit the use of gas Move toward a 10-year adoption cycle Ensure the 2024 WSEC-R improves efficiency while supporting affordability, flexibility, and consumer choice

Date Received	From	Code	Subject/Summary
8/7/2026	Duane Jonlin Hiroshi Yoh	WSEC-R	Support and modifications for clarity of 012 regarding heating system controls
8/7/2026	Kevin Rose, NEEA	WSEC-R	Recommend Option 3 for R405
8/7/2026	Kevin Rose, NEEA	WSEC-R	Support for R-036, U-0.27 windows, with additional comments on cost-benefit analysis
8/7/2026	Poppy Storm, 2050 Institute	WSEC-R	Modifications throughout R403 to provide more detailed direction to properly size heat pump compressors to meet the heating load
8/7/2026	Rachel Koller, Shift Zero Kjell Anderson, LMN Poppy Storm, 2050 Institute Phaedra Beckert, WASEIA Tony Usibelli, Usibelli Consulting Gavin Tenold, NW Renewables Markus Virta, Cascadia Renewables Jason Acosta, RDH Building Science Tom Balderston, Balderston Associates	WSEC-R	Correct an error in the R408.3 building thermal envelope multiplier within the ERI pathway Provide a new, separate table in R408.5 for buildings with on-site power production
8/7/2026	Rachel Koller, Shift Zero Kjell Anderson, LMN Poppy Storm, 2050 Institute Phaedra Beckert, WASEIA Tony Usibelli, Usibelli Consulting Jason Acosta RDH Bldg Science David Reddy, O'Brien360 Gavin Tenold, NW Renewables Ben Roush, FSi Engineers	WSEC-R	Correct the error in the above grade wall factor U-factor in Table R402.1.2 from 0.056 to 0.045

**Received from multiple individuals on multiple dates