

Log Number	ORAL TRANSCRIPT	From	Group	ORAL / WRITTEN	Code	Proposal #	Section #	Position	Summary	Requested Modification	Schedule	Staff Note
24-PC-093		Annette Ademasu	Individual	WRITTEN	WSEC-R	General	x	x	x	x	x	N/A
24-PC-202		Kevin Rose, NEEA	0	WRITTEN	WSEC-R	24-GP1-033/040	R408	0	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	0	0	tech mod
24-PC-203		Kevin Rose, NEEA	0	WRITTEN	WSEC-R	24-GP1-033/040	R408		Calculation documentation for 24-PC-202	0	0	0
24-PC-390		Jonathan Jones	WSU	WRITTEN	WSEC-R	0	Table R402.1.2	0	Table R402.1.2 modifications: Update the ceiling U-factor to 0.25 and the wall U-factor to 0.45	0	0	tech mod / editorial
24-PC-391		Shawn Mullins	Owens Corning	WRITTEN	WSEC-R	24-RE-014 24-RE-034	R303.1.1.2 R402.5 R403.3.5	0	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.	0	0	tech mod
24-PC-392		Annette Ademasu	City of Shoreline	WRITTEN	WSEC-R	0	R406 New section in R403? R402.1.3	0	Modification of residential construction to: •Not require continuous exterior insulation Require all dwelling units to be under positive pressure •Add in credit options for trees, pervious surfaces, energy star appliances •Prohibit GHG emitting sources such as natural gas and heating oil	0	0	0
24-PC-393		Jeremy Klemann	Klemann Brothers Heating and Air	WRITTEN	WSEC-R	24-RE-019 24-RE-015 24-RE-018 24-RE-033/040	R503 R406.2 R404.5 R408	0	• 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	0	0	0
24-PC-394		Nicole McKernan	Board and Vellum	WRITTEN	WSEC-R	0	Table R402.1.3 Table R406.3(2)	0	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.	0	0	tech mod
24-PC-395		Nicole McKernan Part 2	Board and Vellum	WRITTEN	WSEC-R	24-RE-012 24-RE-035	Table R406.3(2) R403.3 R406	0	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	0	0	editorial
24-PC-396		Jonathan Jones	WSU	WRITTEN	WSEC-R	0	Table R406.3	0	Revise Table R406.3(2) to reflect the associated fuel normalization credit each option aligns with	0	0	tech mod / editorial
24-PC-397		Jonathan Jones	WSU	WRITTEN	WSEC-R	0	Table R402.1.3	0	Revise table R402.1.3 footnote f to align with R402.2.1	0	0	tech mod
24-PC-398		Jonathan Jones	WSU	WRITTEN	WSEC-R	24-GP1-216	Appendix CA Appendix RF	0	Better align new Appendix RF and modified Appendix CA	0	0	tech mod
24-PC-399		Jonathan Jones	WSU	WRITTEN	WSEC-R	0	Table R402.1.3	0	Revise Table R402.1.3 to align U-values	0	0	tech mod
24-PC-400		Zac Johnson	Heating Air-Conditioning Refrigeration Distributors International	WRITTEN	WSEC-R	24-RE-015 24-RE-018 24-RE-019	R503 R406.2 R404.5	0	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	0	0	mod don't / tech mod
24-PC-401		Drew Shawver	0	WRITTEN	WSEC-R	24-RE-036 24-RE-035	Tables R402.1.2/3 R406.2 R105.2	0	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	0	0	don't adopt
24-PC-402		Jeff Fogarty	0	WRITTEN	WSEC-R	0		0	Do not restrict gas	0	0	0
24-PC-403		Jim Lazar	0	WRITTEN	WSEC-R	0		0	General support	0	0	0
24-PC-404		Leann Crist	0	WRITTEN	WSEC-R	24-RE-012	R105 R503	0	Oppose the inclusion of duct size and layout in the permitting documents (part of R-012) Oppose continuous insulation required when siding is replaced (model code language)	0	0	0
24-PC-405		Greg Shiffier	SHED	WRITTEN	WSEC-R	24-RE-012 24-RE-035 24-RE-034	R105 R503 R403.3 R406	0	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	0	0	don't adopt
24-PC-406		Phaedra Becket	WASEIA	WRITTEN	WSEC-R	24-RE-033/040	R408	0	Revision of the ERI with renewables pathway (envelope backstop is the same as that submitted on Aug. 5)	0	0	tech mod
24-PC-407		Juliette Dubroca	0	WRITTEN	WSEC-R	24-RE-012	R105.2 R503	0	Oppose the following changes: R105.2 duct specifications on permit docs, R503.1.1.3 continuous insulation for residing	0	0	don't adopt

24-PC-408	-	Neal Andrew Barber	Studio Nocturne	WRITTEN	WSEC-R	24-RE-012 24-RE-036 24-GPI-216	R105.2 R503 Tables R402.1.2/3 Appendix RF	0	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	0	0	0	don't adopt
24-PC-409	-	Gordon Hester	Kiemle Hagood	WRITTEN	WSEC-R	24-RE-038 24-RE-015	R402.1.5 R403.6 Table R406.2	0	Oppose the inclusion of a 15% cap on glazing in the UA equation Oppose the requirement of R105.2 in CZ5 Oppose fuel based penalties in R406	0	0	0	don't adopt
24-PC-410	-	Adam Gage	NEEA	WRITTEN	WSEC-R	0	Table R406.3(2) Chapter 6	0	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	0	0	0	tech mod
24-PC-411	-	Michael Brasgalla	Azure Northwest	WRITTEN	WSEC-R	24-RE-036 24-RE-037 24-RE-038 24-RE-033/040	Tables R402.1.2/3 R402.5 R403.6 Table R406.3(2) R408	0	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 HIERV 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	0	0	0	don't adopt
24-PC-412	-	Christian Welch	Azure Northwest	WRITTEN	WSEC-R	24-RE-036 24-RE-037 24-RE-038 24-RE-033/040	Tables R402.1.2/3 R402.5 R403.6 Table R406.3(2) R408	0	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 HIERV 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	0	0	0	don't adopt
24-PC-413	-	Regina Collins	Azure Northwest	WRITTEN	WSEC-R	24-RE-036 24-RE-037 24-RE-038 24-RE-033/040	Tables R402.1.2/3 R402.5 R403.6 Table R406.3(2) R408	0	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 HIERV 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	0	0	0	don't adopt
24-PC-414	-	Josh Stevens	Azure Northwest	WRITTEN	WSEC-R	24-RE-036 24-RE-037 24-RE-038 24-RE-033/040	Tables R402.1.2/3 R402.5 R403.6 Table R406.3(2) R408	0	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 HIERV 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	0	0	0	don't adopt
24-PC-415	-	Carolyn Logue	WA ACCA	WRITTEN	WSEC-R	24-RE-019 24-RE-015 24-RE-038 24-RE-018 24-RE-033/040	R503 R406.2 R403.6 R404.5 R408	0	- 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 HIERV in CZ 5 - Oppose electrification - Retain flexible compliance tools such as the ERI pathway	0	0	0	don't adopt / tech mod
24-PC-416	-	Gregory Johnson	Avista	WRITTEN	WSEC-R	24-RE-033/040	R408	0	Modification to R408 addressing battery storage	0	0	0	tech mod
24-PC-417	-	Gregory Johnson	Avista	WRITTEN	WSEC-R	24-RE-015	R406.2	0	Modifications to correct error in Table R406.2 (see p. 8)	0	0	0	tech mod
24-PC-418	-	Matthew Solak	Pacific Propane	WRITTEN	WSEC-R	24-RE-019 24-RE-015 24-RE-018	R503 R406.2 R404.5	0	- 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	0	0	0	don't adopt / tech mod
24-PC-419	-	Laura Padden	0	WRITTEN	WSEC-R	24-RE-015 24-RE-038 24-RE-018 24-RE-033/040	R406.2 R403.6 R404.5 R408	0	Support the addition of the ERI pathway Support the new home size distribution for R406 Oppose the HIERV requirement for CZ 5 Oppose the electric readiness provisions Remove any penalties for the use of natural gas	0	0	0	don't adopt
24-PC-420	8/7/2026 Pg 24	Alan Nolan	0	WRITTEN	WSEC-R	24-RE-038 24-RE-018 24-RE-033/040 24-RE-035	R403.6 R404.5 R408 R406.2	0	Oppose the mandatory HIERV requirement for CZ5 Oppose the electric readiness provisions Support the addition of the ERI pathway Support the new home size credit distribution for R406	0	0	0	don't adopt
24-PC-421	8/7/2026 Pg 21	Anne Anderson	Green Mountain Engineering	WRITTEN	WSEC-R	0	Table R402.1.2	0	Retain the 0.056 U-factor for above grade walls	0	0	0	0
24-PC-422	8/7/2026 Pg 22	Anne Anderson	Green Mountain Engineering	WRITTEN	WSEC-R	243-RE-018	R404.5	0	Oppose electric readiness (R-018)	0	0	0	don't adopt
24-PC-423	8/7/2026 Pg 23	Anne Anderson	Green Mountain Engineering	WRITTEN	WSEC-R	0	R402.1.5	0	Oppose the 15% glazing cap in UA path	0	0	0	don't adopt
24-PC-424	8/7/2026 Pg 23	Anne Anderson	Green Mountain Engineering	WRITTEN	WSEC-R	24-RE-036	Tables R402.1.2/3	0	Oppose the U-0.27 window requirement (R-036)	0	0	0	don't adopt
24-PC-425	-	Dylan Sluder	Master Builders Assoc of King and Snohomish Counties	WRITTEN	WSEC-R	24-RE-033/040 24-RE-035 24-RE-036 24-RE-010 24-RE-038 24-RE-018	R408 R406 Tables R402.1.2/3 R402.1.5 R402.5 R402.7 R403.6.1 R404.5 Table R406.3(2) R503	0	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 HIERV 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	0	0	0	don't adopt / tech mod
24-PC-426	-	Sara Emhoff	Board & Vellum	WRITTEN	WSEC-R	Model code change	R503.1.1.3	0	Oppose R503.1.1.3 requiring continuous insulation when siding is replaced	0	0	0	don't adopt
24-PC-427	-	Jeff Pelletier	Board & Vellum	WRITTEN	WSEC-R	Model code change	R503.1.1.3	0	Oppose R503.1.1.3 requiring continuous insulation when siding is replaced	0	0	0	don't adopt
24-PC-428	-	Yi-Chun Lin	Board & Vellum	WRITTEN	WSEC-R	Model code change	R503.1.1.3	0	Oppose R503.1.1.3 requiring continuous insulation when siding is replaced	0	0	0	don't adopt

24-PC-429	-	Mike Moore	Stator	WRITTEN	WSEC-R	24-RE-038	R403.6.1	0	In support of R-038 H/ERV, with suggested changes to the preliminary CBA	0	0	0
24-PC-430	-	Jim van Loben Sels	0	WRITTEN	WSEC-R	0		0	Concerns regarding the increasing cost of building a home	0	0	0
24-PC-431	-	Mike Kennedy	0	WRITTEN	WSEC-R	24-RE-008 24-RE-037	R402 R406	0	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	0	0	tech mod / editorial
24-PC-432	-	Patrick Hanks	BAIW	WRITTEN	WSEC-R	24-RE-035 24-RE-036 24-RE-014 24-RE-018 24-RE-019 24-RE-010	R402.1.5 R402.7 R303.1 R503 Tables R402.1.2/3 R402.5 Table R406.3(2)	0	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)	0	0	don't adopt / tech mod
24-PC-433	-	Tracy Doriot, Doriot Construction	0	WRITTEN	WSEC-R	24-RE-033/040 24-RE-035 24-RE-036 24-RE-010 24-RE-038 24-RE-018	R408 R406 R402.1.5 R402.5 R402.7 R403.6.1 R404.5 Table R406.3(2) R503	0	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 BAIW 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 (7 no proposed change) Oppose the heat pump requirement when replacing AC Establish fuel neutral energy 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	0	0	don't adopt
24-PC-434	-	Duane Jonlin Hiroshi Yoh	0	WRITTEN	WSEC-R	24-RE-012	R403	0	Support and modifications for clarity of 012 regarding heating system controls	0	0	tech mod
24-PC-435	-	Kevin Rose, NEEA	0	WRITTEN	WSEC-R	24-RE-039	R405	0	Recommend Option 3 for R405	0	0	0
24-PC-436	-	Kevin Rose, NEEA	0	WRITTEN	WSEC-R	24-RE-036	Tables R402.1.2/3	0	Support for R-036, U-0.27 windows, with additional comments on cost-benefit analysis	0	0	tech mod / editorial
24-PC-437	-	Poppy Storm	2050 Institute	WRITTEN	WSEC-R	24-RE-012	R403	0	Modifications throughout R403 to provide more detailed direction to properly size heat pump compressors to meet the heating load	0	0	tech mod
24-PC-438	8/7/26 Pg 20 and 26	Rachel Koller, Kjell Anderson, Poppy Storm, Phaedra Becker, Tony Usibelli, Jason Acosta, Markus Virta, Jason Acosta, Tom Balderston	Shift Zero, LMN, 2050 Institute, WASEIA, Usibelli Consulting, NW Renewables, Cascadia Renewables, RDH Building Science, Balderston Associates	WRITTEN	WSEC-R	24-RE-033/040	R403.3	0	Correct an error in the R403.3 building thermal envelope multiplier within the ERI pathway Provide a new, separate table in R408.5 for buildings with on-site power production	0	0	tech mod
24-PC-439	8/7/26 Pg 20 and 26	Rachel Koller, Kjell Anderson, Poppy Storm, Phaedra Becker, Tony Usibelli, Jason Acosta, David Reddy, Gavin Tenold, Ben Roush	Shift Zero, LMN, 2050 Institute, WASEIA, Usibelli Consulting, RDH Bldg Science, O'Brien360, NW Renewables, FSI Engineers	WRITTEN	WSEC-R	0	Table R402.1.2	0	Correct the error in the above grade wall factor U-factor in Table R402.1.2 from 0.056 to 0.045	0	0	tech mod / editorial
24-PC-454	8/7/2026 Pg 21	Jeremy Smitson	WASEIA	ORAL	WSEC-R	24-0P2-001	R406	Support	Supports modifying Table R406 to reduce the maximum achievable credit points for solar photovoltaics (PV) and battery storage options (Credits 6.1 and 6.2) by 0.5 points. They argue that advancements in building efficiency technologies justify leaving more compliance points available for non-solar efficiency measures, ensuring that codes do not rely excessively on on-site generation at the expense of other efficiency solutions.	None	0	0
24-PC-455	8/7/2026 Pg 25	Zachary Sielicky	Northwest Natural	ORAL	WSEC-R	24-0P2-001	R406	Modify	Concerned over indirect and direct electrification measures in the proposed residential energy code—specifically Section R406 energy credit structures and electric readiness wiring mandates. They argue that penalizing natural gas and dual-fuel systems through higher baseline credit hurdles forces builders to add expensive envelope or solar measures, creating a de facto restriction on energy choice while worsening the state's housing affordability crisis. To ensure true fuel neutrality, affordability, and energy reliability, Northwest Natural urges the State Building Code Council to recalibrate Section R406 credit weights, eliminate mandatory electrical readiness pre-wiring, and incentivize dual-fuel hybrid systems.	Revise R406	0	0
24-PC-456	8/7/2026 Pg 27	Larry Andrews	Individual	ORAL	WSEC-R	24-RE-015	R406	Oppose	Opposing proposal 24-RE-015 and Table R406.2, the commenter asserts that energy load calculations demonstrate virtually identical annual energy usage—differing by as little as \$50 per year—regardless of the HVAC equipment installed in modern, tightly built homes. They argue that pushing for incremental efficiency gains under the credit table incurs exorbitant, non-recoverable upfront costs with negligible payback, while steering homeowners toward drafty forced-air heat pumps rather than superior, comfortable options like hydronic radiant heating and cooling.	Do not adopt proposal	0	0

24-PC-457	8/7/2026 Pg 27	Larry Andrews	Individual	ORAL	WSEC-R	24-RE-019	R503	Oppose	Opposing proposal 24-RE-019 for Section R503, the commenter explains that converting existing high-velocity air conditioning systems to heat pumps in existing homes is often technically impossible because manufacturers lack matching coils capable of handling the refrigerant capacity during heating cycles. Furthermore, operating heat pump coils or ductwork in unconditioned attic spaces during Eastern Washington winters causes significant heat loss that creates massive ice dams on roofs, damaging structures and voiding roofing warranties.	Do not adopt proposal	0	0
24-PC-458	8/7/2026 Pg 28	Larry Andrews	Individual	ORAL	WSEC-R	24-RE-025	R403 R503	Oppose	opposes applying strict envelope duct restrictions to existing building retrofits under Section R403.3.2.1. They argue that in two-story existing homes, contractors need the flexibility to relocate return air grilles higher up on interior walls using existing wall cavities. Adding an exemption for interior walls during retrofits allows warm air trapped on upper floors to be effectively recirculated, significantly improving summer cooling comfort and winter energy efficiency without affecting exterior envelope insulation.	Do not adopt proposal	0	0
24-PC-459	8/7/2026 Pg 28	Larry Andrews	Individual	ORAL	WSEC-R	24-RE-019	R503	Oppose	Opposing Section R503.1.2.5.1, the commenter argues that mandating ducted heat pumps effectively eliminates radiant heating and cooling options for homes across the state. They contend that radiant systems naturally cut energy costs by about 10% due to favorable indoor thermal stratification (lower delta-T at the ceiling), making them essential for meeting long-term 70% energy reduction targets. Emphasizing significant financial investments in proprietary radiant technology, the speaker warns of legal action if the language is not amended to permit non-ducted radiant solutions.	Do not adopt proposal	0	0
24-PC-461	8/7/2026 Pg 29	Aaron Barnett	Individual	ORAL	WSEC-R	24-RE-209 24-RE-019 24-RE-035	R406 R503	Support	supports requiring failing air conditioning units to be replaced with heat pumps (Proposals 209 and 019), explaining that modern heat pumps share identical core refrigeration technology with air conditioners while offering superior efficiency across all Washington climates. They emphasize that mandated replacement at equipment failure minimizes total costs by piggybacking on necessary installation labor. Additionally, the speaker endorses home size bracket adjustments (Proposal 035) to correct code inequities that treat small starter homes identically to large mansions, thereby encouraging smaller, affordable housing while requiring larger homes to account for their higher total energy footprint.	None	0	0
24-PC-464	8/7/2026 Pg 33	Tyler Tamoush	Spokane Home Builders Association	ORAL	WSEC-R	24-RE-018 24-RE-033 24-RE-035 24-RE-038	R401 R403 R404 R406	24-RE-018 Oppose 24-RE-033 Support 24-RE-035 Support Option C 24-RE-038 Oppose	Advocates for practical, affordable energy efficiency that avoids imposing heavy upfront construction costs for minimal utility savings. To protect housing affordability, maintain fuel neutrality, and account for Eastern Washington's climate, they urge the Council to preserve the Energy Rating Index (ERI) pathway in Sections R401.2 and R408, adopt Option C in Table R406.3.1 for gradual home-size requirements, keep HRV and ERV ventilation systems optional, reject mandatory electric readiness requirements, and ensure equal treatment for gas and electric fuel sources.	Adopt Supported, Do Not Adopt Opposed.	0	0
24-PC-474	8/7/2026 Pg 39	Elizabeth Torske	Cascade Natural Gas Corp.	ORAL	WSEC-R	24-RE-015 24-RE-018 24-RE-019	R404 R406 R503	24-RE-015 Modify 24-RE-018 Oppose 24-RE-019 Oppose	Opposes two key residential energy proposals and requests a credit adjustment for another, arguing that mandatory requirements penalize consumer fuel choice, restrict urgent technology options, and inflate costs without blocking willing homeowners from adopting heat pumps. Additionally, the speaker criticizes the proposed energy equalization credit table for assigning significantly different credit values to dual-fuel heat pumps and all-electric heat pumps, noting that utilizing direct natural gas for supplemental heating during extreme cold is far more efficient than electric resistance and should receive equal credit value.	Modify / Do not adopt Opposed	0	0
24-PC-482	8/9/2026 Pg 14	Jonny Kocher	RMI	ORAL	WSEC-R	24-RE-023	R404 R503	Support	Advocates for electric readiness requirements in new construction to ensure new homes can affordably transition to heat pumps, induction cooking, and electric dryers without future panel upsizing or conduit retrofits. The speaker also supports Sierra Club's proposal for residential AC-to-heat-pump replacements upon equipment failure, highlighting that replacement at end-of-life maximizes cost-effectiveness and utility bill savings while clarifying that gas appliances remain an option if equivalent energy savings are met. Finally, the commenter urges the State Building Code Council to correct an envelope drafting error present in the CR-102 filing.	Correct an envelope drafting error present in the CR-102 filing.	0	0
24-PC-490	8/5/2026 Pg 29	Mike Kennedy	Individual	ORAL	WSEC-R	24-RE-037	R401 R402	opposed	Opposes proposed changes to Section R401.1 that make the prescriptive R-value and assembly U-factor compliance paths mutually exclusive, warning that forcing an all-or-nothing U-factor approach increases engineering and administrative costs without providing energy savings. The speaker notes that standard model codes like the IECC allow component-by-component compliance and urges the Council to ensure the R-value and U-factor tables remain synchronized instead. Additionally, the commenter questions the practicality of new air leakage testing provider training requirements in Section R402.5.1.2, arguing that a \$1,000 training fee imposes an unnecessary financial burden on small-scale local testers without effectively addressing the root causes of testing discrepancies.	Do not adopt changes	0	0