



1411 East Mission Avenue
PO Box 3727
Spokane, WA 99220-3727

September 27, 2019

Washington State Building Code Council
1500 Jefferson Avenue SE
Post Office Box 41449
Olympia, Washington 98504-1449

RE: Amendments to WA state energy codes – R36 – R406 Credits/R33 Electric Readiness

State Building Code Council Members:

Avista Corp operates a dual-fuel utility serving customers throughout the Northwest, including more than 250,000 electric customers and 167,000 natural gas utility customers in the state of Washington. Avista has been a leader in promoting and achieving energy efficiency, offering conservation programs to our customers dating back to 1978.

We share concerns raised by other utilities regarding two sections of the proposed amendment to the state energy code: R36 on Section R 406 credits and emissions factors, and R33 electric readiness. Avista supports the proposed changes submitted in comments by Gary Heikkinen, who serves as a utility representative on Energy Code TAG. Gary's proposed changes, including eliminating unsupported emissions factors and normalization credits and removal of electrical receptacle installation requirements for heating units, maintains a technology-neutral approach in the built environment and are consistent with the requirements of law. The code should not introduce rigidity through a bias toward any one technology.

We look forward to continuing conversations with respect to these changes and enhancements to the energy code that serves the interests of energy consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Collins Sprague". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

K. Collins Sprague
Senior Director of Government Relations