



**July 12, 2019**

**Washington State Building Code Council  
1500 Jefferson Street Southeast  
Olympia, WA, 98501**

**Re: Climate Solutions comments in support of the proposed 2018 Washington State Commercial Energy Code**

Dear Chair Orth and the Washington State Building Code Council,

Climate Solutions thanks you for the opportunity to submit comments in support of the proposed 2018 Washington State Commercial Energy Code. Climate Solutions is a clean energy nonprofit organization working to accelerate practical and profitable solutions to global warming by galvanizing leadership, growing investment, and bridging divides. The Northwest has emerged as a center of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub. For 20 years, we have cultivated political leadership in the Northwest under the proposition that clean energy and broadly-shared economic prosperity go hand-in-hand, building a powerful constituency for local, regional, and national action on climate and clean energy.

Buildings currently represent 27% of our greenhouse gas emissions, and one of the key ways to ensure that our buildings are as clean, efficient, and protect the future of Washingtonians is through strong energy codes. Climate Solutions strongly supports proposed revisions to the Commercial Energy Code and urges the Council to approve the package of changes. There is significantly more work to be done to ensure all Washingtonians have access to the most efficient buildings, but the proposed 2018 commercial energy code sets us on a pathway to a cleaner commercial building sector, helping to protect the public health of our residents, support a robust economy, and ensure we have a stable climate to live in.

In particular, we highlight strong support for *Proposal 141 - Adopt ASHRAE Appendix G*. This proposal switches the metric from site energy use to carbon emissions. Although the efficiency of buildings remains an important metric, it is critical that the building code consider the carbon emissions from buildings as a metric. Our grid is now on a pathway to 100% clean, and we must prioritize buildings and appliances that include the benefits of low-carbon electricity. This proposal will also better align the building code with state emissions goals, as well as those of many local jurisdictions. As proposed by the Technical Advisory Group, we recommend a value of 0.55 pounds of carbon dioxide equivalent per kilowatt-hour for the electricity carbon metric.

Additionally, we highlight support for *Proposal 159 - Solar-Ready Roofs*, which directs a percentage of the roof be “solar-ready” if there are not shading impediments. With solar costs continuing to decline, increasing customer demand for distributed generation, and a strong state focus on low-carbon technologies, it is a logical step to require that new buildings can



accommodate solar, should the owner choose to install solar panels at a future date. This proposal is extremely low-cost, especially compared to the retrofits often required if solar-readiness is not incorporated from the start. In future iterations of the building code, we recommend that this concept be expanded and require that buildings be “electric ready” for space and water heating.

Finally, we highlight support for *Proposals 45 and 46 – Air Barrier Improvements and Testing*. This proposal would tighten the air barrier test standard and make passing this test mandatory. Building air-tight buildings is much more cost-effective than related future retrofits, and improved building envelope tightness will result in lower energy bills for tenants and building owners. This will also lead to improved indoor air quality, which is becoming even more important with increasing wildfires and the related health impacts from breathing in smoke.

Thank you again for providing the opportunity to submit comments in support of the 2018 Washington State Commercial Energy Code. We look forward to engaging with you as the process moves forward.

Sincerely,

Kelly Hall  
*Washington Policy Manager*  
*Climate Solutions*