

September 25, 2019

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Ralph DiNola

Dear Chair Orth and the Washington State Building Code Council:

New Buildings Institute (NBI) is writing to offer support for the proposed 2018 Washington State Residential Energy Code. NBI is a national non-profit that catalyzes markets to deliver energy and carbon reduction in buildings. Over our 20-year history, NBI has been a leader in the development of national, state and local codes and policy that save energy and improve places people live, work and play.

Energy codes are a critical lever that states can and should use to encourage efficient and healthy buildings. Washington has a legislative mandate for new buildings to be 70% more efficient by 2031 than they were in 2006. The proposed 2018 Washington State Residential Energy Code keeps the state and its new residential construction on a path to reach that goal. In addition, more efficient buildings are more comfortable for tenants, add features to homes that add to their value, and save hundreds of dollars in utility bills for residents. **We support the proposed revisions to the Residential Energy Code, and we urge the Council to approve this code.**

We would like to highlight particular support for the following changes:

- **Add and Require Additional Credits in Option Table:** The full set of proposals to increase the credits will increase the efficiency of the residential energy code by approximately 22% in medium and large homes--the size of the majority of homes built in Washington. The option table also continues to preserve flexibility for homebuilders to meet the requirements of the code--they can choose what options make most sense for the home and owner. This proposal is responsive to the legislative mandate to reduce energy use in new construction 70% by 2031 and to Executive Order 14-04 to accelerate innovation and achievement toward this mandate. The proposals also make important clarifications and structural improvements to the option table to make it easier to understand. *(Proposals 23 and 31)*
- **Credit Carbon Reductions in Option Table:** This proposal is an important step toward decarbonizing residential new construction in Washington state; as electricity becomes cleaner, the option table credits for high efficiency electric measures will increase. *(Proposal 36)*
- **Passive House Alternative Compliance:** This proposal adds passive house certification (PHIUS and PHI) as an alternative performance-based compliance path for homes, which provides for continued flexibility in meeting the energy code requirements. *(Proposal 32)*

- **Water Heater and Dryer Electric Readiness:** This proposal allows homes to have easier and cheaper electrification upgrades in the future by requiring electric receptacles near gas and propane water heaters and dryers, reserved space in the electrical panel, and extra space for all water heaters, to allow for future heat pump water heater replacements. This is a common sense proposal that will prevent expensive electrical retrofits in the future. *(Proposal 33)*
- **Optional “Reach Code”:** This proposal provides two optional “reach code” appendices. Providing these appendices will allow jurisdictions and/or utilities to incentivize efficient residential construction above code in a consistent way. *(Proposal 35)*

Sincerely,



Ralph DiNola  
CEO, New Buildings Institute