



## MEMO

To: Members of the WA State MVE committee  
Members of the WA state building code council

From: Treasa Sweek, CCP (Sweek Consulting Engineers, LLC)  
Robby Oylear, PE (Affiliated Engineers, Inc.)

Date: 8/31/2018

Subject: Public comment on energy code proposal EC148-2018 regarding commissioning process changes

## OVERVIEW

Below is a copy of EC148-2018 proposal language approved by the Energy TAG. We suggest that the following red text be changed:

**C408.1.1 Commissioning in construction documents.** Construction documents ~~notes~~ shall clearly indicate provisions for the commissioning process, and completion requirements in accordance with this section and are permitted to refer to specifications for further requirements. The construction documents shall minimally include the following:

1. A narrative description of the activities that will be accomplished during the commissioning process. At minimum, the commissioning process is required to include:
  1. Development and execution of the Commissioning Plan, including all subsections of C408.1.2;
  2. The *certified commissioning professional's* review of the Building Documentation and Close Out Submittals per C103.6; and
  3. The commissioning report per C408.1.3.
2. ~~Name and company for~~ Roles, responsibilities, and required qualifications of the *certified commissioning professional*.
3. A listing of the specific equipment, appliances, or systems to be tested.

August 31, 2018

## DISCUSSION

This memo is authored by 2 members of the Energy TAG who voted in favor of the proposal, including the proposal's proponent – Treasa Sweek.

Neither the stated purpose of this proposal ("seeking to integrate commissioning best practices with the code requirements") nor the proposal's description mention changes to the stringency of the code. Additionally, during the proponent's introduction, she stated that the proposal was not intended to add stringency to the code.

Upon further discussion, the section noted above does change the stringency and cost of code-related commissioning. Requiring a named individual for commissioning work prior to submitting construction documents to the AHJ will add cost to many projects. Within the commissioning community, it is common for commissioning firms to be secured prior the beginning of construction; however, it is **not** common to have the individual CCP named in the construction documents.

We request that this error be corrected at this time.