



September 28, 2020

Ms. Diane Glenn
Washington Building Code Council
1500 Jefferson Street S.E.,
Olympia, WA 98504

Re: WSR 20-17-049 – Proposed Rules to Adopt the 2018 Edition of the Uniform Plumbing Code

Dear Ms. Glenn,

On behalf of Bradford White Corporation (BWC), I want to thank you for providing an opportunity to comment on the Washington Building Code Council's adoption of the 2018 edition of the Uniform Plumbing Code (UPC). We are pleased to be a part of this important conversation.

BWC is an American-owned, full-line manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage products. In the State of Washington, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs.

On May 7, 2019, Governor Jay Inslee signed HB 1444 into law. This legislation, among other things, created a requirement that all electric storage water heaters in the State of Washington, manufactured after January 1, 2021, be equipped with a demand response function. The legislation, in Section 5; subsection 2, also allows the Washington Department of Commerce (DOC) to establish a later effective date for this requirement (see Attachment A). Having been granted this authority in the Act, the DOC hosted stakeholder workshops and accepted written comments on this issue throughout the summer and fall of 2019.

As a result of this process, the DOC determined that the appliance energy efficiency standard compliance deadline for electric storage water heaters would be extended in part (see Attachment B). In this partial extension, the Department determined that it would maintain the January 1, 2021, compliance date for electric storage heat pump water heaters only. The compliance date for standard electric resistance storage water heaters was pushed back to January 1, 2022. We respectfully ask the Building Code Council to modify the current language of the proposed UPC to harmonize with the DOC-established compliance dates described above.

Built to be the Best™

725 Talamore Drive • Ambler, PA 19002-1873 • 215-641-9400 • www.bradfordwhitecorporation.com



Thank you for continuing to include BWC and other stakeholders in this important conversation. Please let me know if you have any questions or would like any additional information.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Director of Government and Regulatory Affairs

Cc: B. Carnevale; M. Taylor; B. Hill; L. Prader; C. Sanborn; J. Robertson; K. Doyle; J. Ferrante; B. Wolfer; B. Ahee

Built to be the Best™

725 Talamore Drive ▪ Ambler, PA 19002-1873 ▪ 215-641-9400 ▪ www.bradfordwhitecorporation.com

