



# NW Energy Coalition

October 21, 2022

Chair Doan and Members of the Washington State Building Code Council:

On behalf of the NW Energy Coalition, I would like to offer this comment regarding the petition from the Washington Public Utilities District Association (WPUDA) concerning the amendments to the Washington State Energy Code, Commercial Edition (WSEC-C), C411.1, On-site Renewable Energy.

As a member of the technical advisory group that reviewed and moved proposals forward for full State Building Code Council consideration, we are in support of this change to the code, which will require on-site renewable energy (0.5W/sf) on larger new commercial and multifamily buildings across the state, with some exceptions. Our state is moving toward an increasingly clean electricity grid, and distributed energy resources, like rooftop solar, will be a key piece to that transition. In fact, we are starting to see in some utility planning processes that rooftop solar is a needed resource to help mitigate expected load growth from population, as well as new transportation and building electrification<sup>1</sup> or provides different local benefits related to flexibility and resilience.<sup>2</sup> Having new large construction projects add rooftop solar at the start will help meet the current and future needs of our electric grid.

A PNNL analysis found that the initial proposal was cost-effective, and updates to that analysis continue to hold to that conclusion.<sup>3</sup> In addition, a simple cost-benefit analysis is likely underselling the benefits of on-site solar, as it does not capture the benefits of resilience and the way distributed energy resources can mitigate the need for distribution system improvements, which is not necessarily clearly reflected in utility rates.

We recommend that the SBCC deny this petition and keep the code intact. Thank you for the consideration.

Best Regards,

Amy Wheelless  
Senior Policy Associate  
NW Energy Coalition

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<sup>1</sup> Seattle City Light's 2022 IRP calls for 24 MW of new rooftop solar to help mitigate load growth. <https://www.seattle.gov/documents/Departments/CityLight/2022IntegratedResourcePlan.pdf>

<sup>2</sup> Puget Sound Energy's 2021 Clean Energy Implementation Plan (CEIP) sets an initial sub-target for distributed solar of 80 MW. <https://www.cleanenergyplan.pse.com/>

<sup>3</sup> Comments of PNNL. October 18, 2022. [https://www.sbcc.wa.gov/sites/default/files/2022-10/PNNL%20Responce\\_10-18-22.pdf](https://www.sbcc.wa.gov/sites/default/files/2022-10/PNNL%20Responce_10-18-22.pdf)