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November 29, 2022

Washington State Building Code Council

ATTN: Washington State Building Code Council Members (via email)  
1500 Jefferson St SE  
Olympia, WA 98501

RE: NWGA Comments Concerning Commercial Energy Code Proposals 103, 136 and 179

Members of the Washington State Building Codes Council (SBCC):

The Northwest Gas Association represents the four natural gas distribution companies and two interstate transmission pipelines that serve warmth and comfort to 3.5 million residents and productive energy to 110,000 businesses, institutions and industries that employ hundreds of thousands of people in Washington State. Our members own and operate 45,000 miles of safe, reliable energy delivery infrastructure here.

NWGA members acknowledge the climate imperative and the need to act together to decarbonize. We embrace our role in helping the region achieve its decarbonization goals. Indeed, we maintain that the region cannot achieve its ambitious objectives without relying on the natural gas delivery system.

Within the constraints of existing policy and regulations, NWGA members are keenly focused on and investing in energy efficiency, innovation, fuel decarbonization and replacing dirtier fuels. Furthermore, policies recently passed by the Legislature will accelerate the process of decarbonization and should be allowed to work before piling on ill-considered and detrimental proposals without regard for the consequences of those proposals.

To date, the 2021 commercial energy code process has lacked sound reasoning and careful analysis. It has instead been biased in the consideration of and advocacy for commercial energy code proposals 103, 136 and 179. **We strongly oppose these ill-considered code proposals and ask the SBCC to remove proposals 103, 136 and 179 from the package that goes to the CR103.**

It has been wrongly suggested that there is no plan for how the gas system will meet the State's greenhouse gas emission (GHG) reduction goals. On the contrary, the gas industry supported Washington's historic Climate Commitment Act (CCA) in 2021, which prescribes a compliance pathway that must be met. Additionally, the integrated resource planning process conducted by gas utilities at the direction of the Utilities and Transportation Commission (UTC) describes how each investor-owned utility will acquire requisite resources to serve anticipated demand in compliance with existing laws and regulations.

These electrification code proposals lack the requisite data to warrant adoption. In fact, securing necessary data to inform future carbon policies is the very rationale for why we and other stakeholders negotiated in good faith, and agreed to the UTC Proviso for system research. Finally, these code proposals add nothing to the CCA in terms of achieving the State's GHG reduction goals. The CCA mandates that GHG reductions occur in line with the State's goals and provides a market-based mechanism to facilitate compliance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan S. Kirschner". The signature is fluid and cursive, with a long horizontal stroke at the end.

DAN S. KIRSCHNER

Executive Director