



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

PUBLIC AFFAIRS

September 21, 2012

In reply refer to: DKR-WSGL

Mr. Ray Allshouse, Chair
Washington State Building Code Council
P.O. Box 41014
Olympia, WA 98504-1014

Dear Chairman Allshouse and State Building Code Council Members:

Thank you for providing the opportunity to submit comments on the 2012 Washington State Energy Code (WSEC). The Bonneville Power Administration (BPA) supports the adoption of all cost-effective energy efficiency measures proposed for the 2012 WSEC.

BPA is a not-for-profit federal electric utility that markets wholesale power to utilities and direct service industry customers and operates 15,000 miles of high-voltage transmission lines in the Pacific Northwest. Among its different programs, BPA manages an aggressive energy efficiency effort that encourages its customer utilities to invest in this important low-cost energy resource. By investing in and supporting cost-effective energy efficiency we, as a region, reduce or postpone the need to build new, more expensive power generation and new transmission lines to serve load growth.

We specifically want to highlight our support for including the residential options table in the WSEC, which Ecotope's analysis determined will save 681 kWh, on average, per home. While this table does not exist in the 2012 International Energy and Conservation Code, it is a flexible way to increase energy savings for Washington homeowners and has been implemented successfully in previous code cycles.

We also support the inclusion of any measures determined to be cost-effective for the non-residential codes, though we understand that this analysis is still underway.

The key reasons why we support increasing energy efficiency in the 2012 WSEC are:

- Energy efficiency is the lowest cost energy resource; these efficiency upgrades will pay for themselves with monthly energy bill savings. The analysis performed by Ecotope showed the residential options table as a cost-effective way to increase energy efficiency. The cheapest and cleanest energy is the energy that the region doesn't need to buy.
- Building energy codes capture conservation as buildings are being built, so the opportunity for efficiency is not lost. Retrofits to existing buildings are often cost-

prohibitive for decades after construction is completed, making the time of construction the only opportunity to optimize a building's energy efficiency.

Thank you, for all the time and expertise you invest in the State Building Code Council and its important work. We appreciate the opportunity to comment and we urge you to adopt all cost-effective energy efficiency measures proposed for this cycle.

Sincerely,

[/s/Elizabeth C. Klumpp](#)

Elizabeth C. Klumpp
Western Washington Liaison
Bonneville Power Administration