



Building Industry Association of Washington
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October 14, 2021

Washington State Building Code Council
CC: Stoyan Bumbalov, Managing Director
1500 Jefferson St SE
Olympia, WA 98501

Dear Members of the State Building Code Council:

The Building Industry Association of Washington (BIAW) urges you to address the severe shortage of HVAC heat pumps by selecting one of the two options provided in an Emergency Rule Proposal submitted on October 14, 2021 to the WSEC-Residential Building Code, Section 406.

BIAW's nearly 8,000 members are concerned with the inefficiency of the operation of these systems and officially propose a temporary revision to Table R406.2 to allow 1.0 credit for System Type 1 **OR** to remove the requirement for fuel normalization credits for a specified amount of time, to be determined by the State Building Code Council.

While the home building industry attempts to comply with the 2018 WSEC-Residential Code requirements, the HVAC industry is reporting unprecedented supply chain shortages. Deliveries for heat pumps are unpredictable and costs for these systems have increased up to \$6,900. One example is Gensco, the main distributor and manufacturer of HVAC products for the five-state Pacific Northwest region. **They already have more than 20,000 HVAC heat pump units on backorder.** Please see attached a recent letter they've sent to Building Departments and customers: ***Gensco Heat Pump Supply October 2021.***

While some homes have the indoor HVAC unit (air handler or furnace), ductwork, and thermostat installed, they are waiting for the outdoor HVAC heat pump or AC unit. Although indoor equipment is capable of supplying heat to a building even if the outdoor equipment is not installed at the same time, this is a severely inefficient operation of these products and results in increased energy usage, in direct contradiction to the State Building Code Council's energy reduction goals.

Home owners – if Building Departments allow a temporary certificate of occupancy to complete closing – are being forced to rely on air handlers to heat and air condition their homes. As temperatures drop, builders are expecting home owners relying on air handlers to see electric bills in excesses of \$1,000 each month. BIAW urges the State Building Code Council to act immediately.

BIAW would recommend the State Building Code Council choose between the two options listed above and within the Emergency Rule Proposal (*see enclosed*), and allow their selection to be effective from date of adoption of the Emergency Rule to the effective date of the 2021 WSEC-Residential Code (July 1, 2023). We believe this will allow enough time for the supply chain to make a correction.

Thank you for your consideration of this request to help address the severe shortage of compliant heat pumps and affordability of utility bills throughout Washington's coldest months.

Sincerely,

A handwritten signature in black ink, appearing to read 'G Lane', followed by a long horizontal line extending to the right.

Greg Lane, Executive Vice President
Building Industry Association of Washington