Build it Right: Seattle’s Commercial Energy Code

Buildings are one of the largest and fastest-growing sources of Seattle’s climate pollution, contributing over a third of total emissions—and rising. These emissions pollute our air and accelerate climate change, which disproportionately harm communities of color. **For the health of people and our planet, Seattle must dramatically reduce fossil fuels in buildings over the next decade.**

One critical part of the solution is right before us, as the City of Seattle is updating its commercial and large multifamily building energy codes in 2020. We need to build it right from the start to prevent costly renovations in the future. Adopting these codes will also drive innovation that leads to sustainable green jobs and significant reductions in climate emissions from buildings—moving our city closer toward a clean energy future.

**Improvements to Seattle’s Commercial Energy Code**

To reduce climate pollution, we can—and we must—make significant energy efficiency and energy use improvements in the design and construction of buildings being built today. Proposed updates to the Seattle Commercial Energy Code are based on the latest knowledge, experience, and science of constructing clean and efficient buildings.

1. **Eliminate Most Fossil Fuel Uses**
   The bulk of building emissions comes from burning fossil fuels like gas and oil for space and water heating and powering appliances. A critical code update is to eliminate most fossil fuel uses for space and water heating in favor of clean, efficient technologies.

2. **Prioritize High-Efficiency Building Envelopes**
   Building envelopes, such as the walls and windows, often remain unchanged for generations, so it is imperative to build them right from the start. Code updates call for efficient envelopes to minimize heat loss and air leakage, making it more comfortable for tenants. It is also cost-effective for owners, increasing the building’s value, while lowering operating costs and avoiding costly upgrades down the road.
3. Make the Best Use of Seattle’s Clean Electricity
Seattle has carbon-neutral electricity, and we should make the best use of it. Proposed updates to the energy code would eliminate most inefficient electric resistance space and water heating in favor of efficient heat pumps, and ensure that lighting installed is state of the art.

4. Ramp Up Renewable Solar Energy
The code updates extend solar readiness requirements to multifamily buildings and require more on-site solar in commercial buildings. Putting more solar on buildings leaves more clean electricity available for other uses, like transportation and heating.

Process for Code Review and Approval
Every three years, the Seattle Department of Construction and Inspections (SDCI) develops improvements to strengthen the City’s energy code for commercial and large multifamily buildings. The process to date and next steps include:

End of 2019: SDCI reviewed and built on the statewide commercial energy code and latest technology, consulting with engineers, architects, developers, building owners, and other stakeholders.

Jan – Feb 2020: The City held four public meetings to solicit technical comment and input on the initial draft changes to updates.

Mar – July 2020: SDCI refined the proposed updates, integrating stakeholder feedback.

Aug – Sept 2020: SDCI holds public meetings to review the draft updates.

Oct 2020: Seattle Construction Codes Advisory Board (CCAB) reviews the proposed updates.

Jan 2021: Seattle City Council reviews and adopts the energy code improvements.

Mar 2021: The updated Seattle Commercial Energy Code goes into effect, in line with the statewide building code updates.

For more information on getting involved, contact Peachie Aquino or Amy Wheeless, NW Energy Coalition, peachie@nwenergy.org or amy@nwenergy.org.
Proposed Improvements to Seattle's Commercial Energy Code

**Highest-Impact Proposals**

1. **C103.** Add “reduction of carbon emissions” to Intent section.
2. **Table C402.4.** Reduce allowable fenestration U-values.
3. **C402.1.4.2.** Thermal resistance of mechanical equipment penetrations.
4. **C403.1.4.** Formalize existing code restrictions on electric resistance and fossil fuel space heating. Extend to multifamily (Delayed implementation until Jan 1, 2022).
5. **C404.2.3.** Require heat pump water heater for R-1 & R-2 buildings with central hot water (Delayed implementation until Jan 1, 2022).
6. **Table C405.4.2.1.** Reduce interior LPAs (lighting power allowances) 10%.
7. **C406.1.** Increase C406 credit requirement to 8 (from 6) credits.
8. **C407.3.1.** For energy modeling, prohibit envelope heat loss that is greater than 10% worse than prescriptive code.
9. **Table C407.3(2).** Require building performance factor (BPF) 10% below WA Appendix G modeling values.
10. **C412.1.** Increase on-site solar PV from 0.07 W/square foot to 0.25 W, based on all floors.

**Additional Envelope Measures**

1. **C402.2.9 & C402.2.10.** Thermal bridging control for concrete balconies & window frames.
2. **C505.1.** Exempt certain change of use projects with high process loads from envelope improvement requirements.

**Additional Mechanical Measures**

1. **C403.3.5.1.** Require both DCV (demand control ventilation) and energy recovery for high occupancy spaces larger than 650 sf.
2. **C403.7.1.** Reduce DCV threshold from 25 to 15 occupants/1000 sf (per mechanical code).
3. **C403.3.5.1 and C403.7.6.** Increase energy recovery ventilation effectiveness from 50% to 60%.
4. **C404.7.3.1.** Service hot water circulation controls and pipe/tank insulation.
5. **(Mechanical Code) Require MERV 13 filtration to mitigate wildfire smoke impacts. Exception for small HVAC units.

**Additional Lighting & Electrical Measures**

1. **C405.2.** Provide LLLC (luminaire-level lighting controls) or networked lighting control system for large (>5,000 sf) open office areas.
2. **C405.4.1.** Increase minimum efficacy for “indoor horticultural lighting” to 1.9 micromoles per joule.
3. **C405.7.1.** Provide electrical receptacles at dwelling unit gas-fired appliances, for future electric appliances.
4. **C411.1.** Extend solar readiness requirement to multifamily buildings.

**Additional Efficiency Credit Measures (C406)**

1. **Table C406.1.** Reduce to two credits for “basic” dedicated outdoor air system (DOAS) in R-2 occupancy (double dipping).
2. **Table C406.1.** Disallow C406 credits for fossil fuel-fired equipment.

**Additional Energy Modeling Measure (C407)**

1. **Table C407.3(2).** Base Target Performance Path (TPP) targets on Appendix G BPF values, instead of the current list of target values.
2. **Table C407.2.** Add renewable energy to mandatory measure list.