



Shaping Tomorrow's Global Built Environment Today

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February 2, 2026

The Honorable Davina Duerr
Washington State Capitol
House Local Government Committee
416 Sid Snyder Avenue SW
Olympia, WA 98504

RE: WA HB 2141 “Concerning Building Codes”

Representative Duerr:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating, and Air Conditioning Engineers. ASHRAE is a professional and technical society of 55,000 members dedicated to energy efficiency, indoor air quality, resiliency, and sustainability in the built environment. Through the Society’s research, standards writing, publishing, certification, and continuing education, ASHRAE shapes tomorrow’s global built environment today. As one of the premier subject matter experts on the built environment, and on behalf of our 960 members in the state of Washington, I wish to share our opposition to WA HB 2141 which would impose a ten-year moratorium on building energy code updates, and thereafter, double the time in between the state’s building energy code updates.

Washington’s commercial energy code is based off the International Energy Conservation Code (IECC), which in turn references ASHRAE’s 90.1 - *Energy Standard for Sites and Buildings Except Low-Rise Residential Buildings*. In Washington’s commercial energy code, Standard 90.1 is referenced over 100 times. New editions of these codes and standards are published every three years. Each new edition delivers greater energy savings than the addition before while maintaining cost effectiveness and providing return on investment.^{1,2}

¹ <https://www.energycodes.gov/infographics>

² <https://www.energycodes.gov/methodology>



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We understand the idea underpinning this legislation to be that Washington's regular adoption of modern energy codes is in some way responsible for high housing costs, or that ceasing to adopt up-to-date energy codes will help control housing costs. This idea is fundamentally incorrect. The actual outcome of this legislation, were it to pass, would be a decade-long failure to utilize one of the most powerful tools in the state's toolbox for addressing greenhouse gas emissions and lowering costs for families and businesses.

The residential sector accounts for about one-fifth of Washington's total energy consumption, and commercial buildings account for about one-seventh.³ Together, homes and business represent more than a third of the state's total energy use, and that energy is primarily used to heat and cool buildings. This matters for emissions, and for family's and business's bank accounts, because millions of buildings in Washington are still heated with natural gas, and the electricity that runs AC systems in Washington is not from fully decarbonized sources.⁴ If this legislation were to pass, over the next decade massive amounts of money would be wasted, and massive amounts of carbon emitted, by heating and cooling buildings that are unnecessarily inefficient because they were built to an out-of-date code. In contrast, if this legislation is defeated, Washington will instead see a decade of cost savings, where money stays in Washingtonians pockets and is spent inside the state instead of paying for natural gas imports.

The use of modern energy codes, and conducting regular energy code updates, has a proven ROI with low upfront costs. Each new edition of the energy code is evaluated by the Department of Energy's Pacific Northwest National Laboratory to ensure that the code is cost effective and delivers energy savings.⁵ One of the major reasons that the costs versus return on investment for energy codes can be justified is because any upfront costs are amortized over the course of a mortgage, whereas the cost savings from lower utility bills kick in at 100% right away. Subsequently, new home buyers quickly find themselves cashflow positive, and the lifecycle cost savings always are greater than upfront costs.

Lastly, please consider the long life of buildings. Structures last for decades, sometimes centuries. Because energy-efficiency retrofits are far more costly and complex than building to a strong standard from the start, the energy code in place at the time of construction effectively locks in a building's efficiency, fossil fuel use, and operating costs for its entire lifetime. This legislation would essentially create a decade-long cohort of buildings constructed to outdated standards; structures that exacerbate the climate crisis and leave their owners and occupants with higher energy bills for decades to come.

³ <https://www.eia.gov/states/WA/analysis>

⁴ <https://www.nwceatlas.org/visualization/northwest-heating-fuels>

⁵ <https://www.energycodes.gov/methodology>



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On behalf of our 960 ASHRAE members in Washington, thank you for your consideration of these comments in opposition to House Bill 2141. We urge you to swiftly dismiss this bill. If you have any questions, please do not hesitate to contact me or have your staff email GovAffairs@ashrae.org.

Sincerely,

Bill McQuade
ASHRAE Society President, 2025-2026