



605 First Ave. Ste. 401 Seattle, WA 98104

January 7, 2009

Amanda Eichel  
City of Seattle – OSE  
Seattle Municipal Tower  
Seattle, WA 98101

Dear Amanda,

First, I want to express my appreciation to the City of Seattle and Mayor Nickels for convening the Green Building/Energy Efficiency Task Force and the invitation to the Northwest Energy Efficiency Council (NEEC) to participate. I have enjoyed the robust discussions we have had at Task Force meetings and acknowledge the skill and patience of Jayson, yourself, and the consulting team in leading this effort.

I will keep my comments here brief as you have provided me with ample opportunity to articulate the viewpoint of the energy efficiency industry within the Task Force process. I will underscore here, however, the immense challenge we collectively face to realize the full extent and benefit of energy efficiency resources so necessary to meeting the critical goals of an affordable and secure energy future and climate stabilization. The full cooperation and collaboration of all the stakeholders in this process will be necessary to get there.

In the area of energy disclosure, we support active mechanisms that encourage all building owners to engage in the effort of monitoring and accounting for their energy performance. You can't manage what you don't measure. To that end, we support the use of the ENERGY STAR Portfolio Manager program as an effective means for this in commercial and institutional buildings. We believe that there is sufficient capability and support in these building sectors to warrant a disclosure requirement. In so doing, the City should craft this requirement with sufficient flexibility to not place undue immediate hardship on owners of very small commercial buildings (e.g. less than 10,000 square feet). Ideally, this disclosure requirement would be paired with a tax incentive that rewards commercial property owners for demonstrated superior energy performance on an annual basis. We do not believe that there is a sufficiently developed analogue to Portfolio Manager at this time to create a similar requirement for energy performance disclosure for residential properties.

In the area of building codes, we recognize that increased stringencies in the energy code can bring about significant energy savings. There are some important things to keep in mind if the City contemplates increased code stringencies. First, new code requirements

impose a learning curve for owners, building professionals, and the code enforcement community. Adequate time and resources must be budgeted to account for this need. Also, importantly, the City must be mindful of the interactive effect of higher energy code requirements, utility incentive availability, and the willingness of existing property owners to undertake major energy renovations that trigger the code in their buildings. If the energy code is made more stringent, the City should review how to mitigate any detrimental effects that has on property owners decisions to voluntarily upgrade their building systems. Given the preponderance of efficiency resources are in the City's already existing built environment, this issue must be carefully analyzed and mitigation strategies employed, ensuring that new code requirements encourage rather than impede building modernization.

Again, thank you for allowing us the opportunity to participate in this important City conversation.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Price", with a stylized flourish at the end.

Stan Price, Executive Director