



# Code Amendment Proposal Application

Department of Consumer & Business Services

Building Codes Division

1535 Edgewater NW, Salem, Oregon

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Oregon.gov/bcd

**Read the entire code amendment proposal application before completing this form. Please complete all parts before submitting your proposal and refer to the provided checklist.**

## APPLICANT INFORMATION

Name: Kevin Duell

Date: 08/16/2022

Representing (if applicable): NW Natural

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City: Portland

State: OR

Zip: 97204

Email address: kevin.duell@nwnatural.com

## PROPOSAL INFORMATION

Specialty code: ORSC

Code section(s): TABLE N1101.1(2)

Briefly explain the subject of your proposal: Clarify descriptions and modify requirement to tankless/instantaneous water heaters in Additional Measures table for High Efficiency Water Heating Systems.

## INSTRUCTIONS AND CHECKLIST

Fill in all the information above and submit this page, signed and dated, with the required supplementary information for Parts I, II, III, and IV described on page 2 of this application. This application may be submitted by mail to the mailing address above, or by email to [BCD.PTSPtech@oregon.gov](mailto:BCD.PTSPtech@oregon.gov).

### Summary checklist for the applicant:

- Part I** Code amendment language is attached in the proper format.
- Part II** Amendment proposal requirements for amending the code have been reviewed.
- Part III** Amendment proposal criteria questions have been answered and are attached.
- Part IV** If applicable, additional ORSC energy efficiency amendment proposal information is attached.

**Note:** One application is required for each code section you are proposing to amend. If this proposal requires changes in other sections of the code for alignment, include those changes as part of this application.

## APPLICANT SIGNATURE

Signature: *Kevin Duell*

Date: 8/26/2022

**Copyright notice:** By signing this Code Amendment Proposal Application, I understand and acknowledge that the work contained in this application is original, or if not original, I have the right to copy the work. By signing this work, I understand that any rights I may have in this work, including any form of derivative works and compilations, are assigned to the Department of Consumer and Business Services Building Codes Division. I also understand that I do not retain or acquire any rights once this work is used in a Department of Consumer and Business Services Building Codes Division publication.

**PART I – CODE AMENDMENT LANGUAGE**

**TABLE N1101.1(2)  
ADDITIONAL MEASURES**

<b>2</b>	<b>HIGH EFFICIENCY WATER HEATING SYSTEM</b> a. Natural gas/propane <u>storage</u> water heater <u>&gt;20 gal</u> with minimum <del>UEF</del> <u>0.90 UEF</u> , or b. Electric heat pump water heater with minimum <del>UEF</del> <u>3.5 UEF</u> , or c. Natural gas/propane tankless/instantaneous <u>water</u> heater with minimum <del>0.80</del> <u>0.90</u> UEF and <del>Drain Water Heat Recovery Unit installed on minimum of one shower/tub shower</del>
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**Part III – CODE AMENDMENT PROPOSAL CRITERIA**

Proposal

1. Describe the concept and purpose of this proposal. Clarify that option a is meant for storage water heaters >20 gal. Use “UEF” consistently in all options. Eliminate requirement for DWHR, but increase efficiency requirement of the tankless unit to be consistent with requirement for storage water heater.
2. What problem in the existing Oregon code or national model code is this proposal solving? How does this amendment address the issue? If you have evidence demonstrating the problem, submit that information. Makes delineation between storage and tankless water heaters clearer and simplifies requirement for option c.
3. Has this been proposed at the national model code level. If so, explain when it was proposed, what happened, and why it was not adopted. Provide all associated national model code hearing information and background. A code change for Section R408 has been proposed for the 2024 version of the IECC that would use Energy Star Ver. 5.0 levels of energy efficiency for water heaters. The ES Ver. 5.0 efficiency levels are slightly different than those shown here. The proposal was approved by the Consensus Committee and it is anticipated that it will be included in the first public review draft.

Implementation and fiscal impact

1. Explain how the proposed provisions would be enforced? Are additional inspections or permits required? Describe any necessary equipment, training, tests or special certifications. Enforcement should be easier by not requiring the DWHR installation. No other additional inspections, permits, equipment, training or special certifications needed.
2. What is the fiscal impact of this proposal? Provide a cost benefit analysis and include the resources or methods you used to determine the fiscal impact. First cost savings of \$1000-\$1500 by not requiring DWHR installation, but increase of \$500-\$800 for the higher efficiency tankless water heater.

Impacted stakeholders and other specialty codes

1. It is important that proposals be shared with stakeholders that will be impacted by them. Was this proposal developed with people or organizations likely to be affected by it? Has it been reviewed or shared with people or organizations likely to be affected by it? If so, who, and if not, why not? Proposal

was reviewed by OHBA. They were supportive and didn't see issues that would affect their constituency.

2. Does this proposal impact other specialty codes or statewide programs? [We don't believe so.](#)