



**City of
Portland, Oregon**
Bureau of Development Services
FROM CONCEPT TO CONSTRUCTION

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June 5, 2020

Construction Industry Energy Board and Residential & Manufacture Structures Board
State of Oregon, Department of Consumer and Business Services
Building Codes Division
1535 Edgewater Street NW
P.O. Box 14470
Salem, OR 97309-0404

Re: Written Comments on the Construction Industry Energy Board and residential and
Manufactured Structures Board on June 9,2020

Dear Members:

This letter contains our comments on the discussion questions proposed by BCD Interim
Administrator Lori Graham and the proposed energy code adoption.

Discussion Questions:

1. Because of the previous ambitious timeline, a code committee was not appointed to consider the residential code provisions. If a code committee were appointed at the July Residential and Manufactured Structures Board meeting, it could meet and provide a recommendation to the board, using the division proposals as a starting point for their work. Given the new timeline, should a code committee be appointed to consider the code and make a recommendation to the board?

We do support the appointing of a code committee to make recommendations to the board and allow public comment on the division proposals. There is a need to move the energy code forward, but we need to be sure that it is done in an inclusive and thorough process.

2. Does the board have feedback on how to best proceed with a Reach Code that will meet the requirements of EO 20-04 and statute, and be a useful value-added tool to builders and contractors desiring to build above code?

We would encourage you to use the Northwest Energy Efficiency Alliance (NEEA) and other Oregon professionals to participate in committee work this summer as part of the development process for the Reach Code. Seattle and Denver have programs that have encouraged the use of reach codes that have been successful, and we need to find similar ways to encourage its use in Oregon.

The biggest issue that we have faced with changes to the energy code is training of plan review and inspection staff for the change to ASHRAE 90.1-2016 what little training we received hasn't meet our needs. When changes are to an existing code the training that is needed is limited but when we changed to a new code that requires much more training than we have been able to obtain. We would encourage a full day of training when you move to ASHRAE 90.1-2019 to cover all of 90.1 not just the changes. That said, we support the Governor's Executive Orders EO 17-20 and EO 20-4 and support moving ahead with the adoption of the ORSC energy provisions and updating the ASHRAE 90.1 standards to the 2019 version.

We are supportive of the proposed changes to the residential energy provisions as part of the 2018 ORSC.

Thank you for the opportunity to comment on the draft regulations and for the work that you are doing on the codes to meet the Governor's Executive Orders.

Sincerely,

Terry Whitehill
City of Portland Building Official