



November 30, 2022

Senator Lieber, Senator Findley, Representative Marsh, Representative Owens, and Members of the taskforce:

My name is Kerry Meade and I'm the Executive Director of the Northwest Energy Efficiency Council (NEEC). NEEC is a non-profit business association with a mission to decarbonize building energy use. Our member businesses are working at the forefront of the building services industry to support their customers in achieving their energy use and decarbonization goals.

Thank you for this opportunity to provide comment to the Resilient Efficient Buildings Taskforce. The work you are undertaking will shape the future of Oregon's building stock and lay the groundwork for success in meeting the state's climate goals while expanding economic opportunity to the state's residents. We believe buildings are an essential part of the clean energy transition. As we seek to decarbonize electricity, success hinges in part on our ability to better shape and align electricity demand with supply; shifting our thinking away from buildings as one-way consumers of electricity to grid interactive efficient buildings that can respond within moments to any number of requests or signals from the grid to shift their demand, act as batteries, or even act as power plants. We are grateful for this opportunity to share these general comments.

NEEC is pleased to see that the Taskforce is considering building performance standards. We believe a well-designed building performance standard is the essential first step in shifting to a resilient and smart buildings focus. Depending on how they are designed, performance standards remove unnecessary and prescriptive rules about efficiency inside buildings, shifting instead to a standard metric that can be used to understand the overall efficiency of the building and compare that against peers—the energy use intensity (EUI) or similar metric. This approach incentivizes buildings owners and those who serve them to think innovatively about how to shape a building's energy use and lower its overall EUI in the most affordable manner possible. Unlike the energy code, a performance standard sheds light on the performance of not just the newest buildings but also the existing buildings that comprise the largest share of the building infrastructure.

We were excited to also see that the Taskforce is considering the role of the Energy Trust of Oregon. ETO is a valuable resource and Oregon is fortunate to have a dedicated organization with a brilliant and passionate staff who can lend their expertise in supporting building decarbonization. We support the proposal to shift ETO to a GHG rather than energy efficiency focus. Energy efficiency remains an essential tool in achieving the successful implementation of HB 2021, however the way in which we assess the value of EE is shifting. Instead of considering EE in a silo separate from other building interventions such as demand response, onsite renewables, battery storage etc., this shift would allow ETO to design programs that can incentivize any combination of those interventions to achieve the best outcomes for the building owners/occupants and the state more broadly. We also see this policy as



going hand in hand in with the proposal to “Align Energy Efficiency Programs with State Climate Goals,” which we also support.

There are a few additional policies that were discussed that we believe are all good policies and should be moved forward. Specifically, we support the plans to incentivize heat pumps. Heat pumps are a specific technology that can provide the multiple benefits of efficiency and decarbonization of space heating while also improving the indoor comfort of occupants in times of excessive cold and notably also in times of excessive heat. Given the recent federal funding set aside for such efforts, this is an easy opportunity for Oregon to make tremendous headway toward meeting its state climate goals. We also see the plan to decarbonize public buildings as an excellent opportunity for the state to “lead by example.”

Again, thank you for this opportunity to comment. We look forward to seeing the outcome of this Taskforce’s work.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry Meade".

Kerry Meade
Executive Director
Northwest Energy Efficiency Council