

From: [Shem Heiple](#)
To: [PUC.puc.publicmeetings * PUC](#)
Subject: Extension to the Energy Trust New Buildings whole building cost effectiveness exception
Date: Sunday, August 22, 2021 3:02:02 PM

Dear OPUC,

I am writing to you to highly recommend the extension of the cost effectiveness exception for the ETO whole building program from the perspective of a building engineer designer and energy analyst. I have worked on ETO incentive projects providing energy analysis for over twelve years in their new building programs. The new 2019 and now 2021 Oregon energy code with the adoption of the ASHRAE 90.1-2016 has added a high level of difficulty in providing accurate early design energy savings and potential incentive amounts to the building owners that is necessary to drive and nurture the integrative design process for a successful high performance design.

The current whole building program and incentive process under the current exception has alleviated much of the difficulty that comes with the new energy code by making the incentive process more straightforward as a design consultant. This makes it easier to determine project incentive amounts with the energy analysis that the owner can use to make important design decisions and point the project towards better efficiency.

The design community has not yet adapted to the new energy code and an extension of the cost benefit exception would be very beneficial during this time of transition.

Sincerely,
Shem Heiple

Shem Heiple PE, LEED AP
Associate Principal/Sr. Mechanical Engineer

INTERFACE ENGINEERING INC.
100 SW Main Street, Suite 1600, Portland, OR 97204
email shemh@interfaceeng.com
portland 503.382.2663
cell 503.998.9451

www.interfaceeng.com

Chicago / Los Angeles / Honolulu / Portland / San Francisco / Seattle / Washington, DC

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