Seattle Department of
Construction & Inspections

2018 SEC Code Interpretation

C503.2 Change of Space Conditioning from Fossil Fuel Heating to Heat Pump
Release Date: December 10, 2021
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The following is a pre-approved code alternate intended to provide guidance to staff for consistency of review and is subject to change without notice. Application of this code alternate to specific projects may vary.

Code Issue:

The "change of space conditioning" provisions of Seattle Energy Code (SEC) Section C503.2 trigger the entire building be brought up to current Seattle Energy Code requirements.

I am upgrading a heated building by installing electric heat pumps which will provide cooling in addition to heating for the first time. Do I have to upgrade the rest of my building to meet current Seattle Energy Code requirements?

Code Alternate:

Where triggered by SEC 503.2, a full energy code upgrade of the rest of the building is not required under these conditions:

1. The existing heated but not cooled space is altered to become both heated and cooled by replacement of the existing heating-only HVAC system with an electric heat pump HVAC system; and
2. The annual carbon emissions from heating and cooling of the new HVAC system is less than the annual heating-only carbon emissions of the existing HVAC system. SDCI will accept energy modeling complying with SEC Section C407 or another calculation method approved by the code official to demonstrate the reduced annual carbon emissions.

The provision in SEC 503.2 that triggers a nearly full energy code upgrade for owners converting their gas or electric resistance heating systems to heat pumps can be cost prohibitive. Electric heat pump conversions result in significant energy savings as well as eliminate the use of fossil fuels. These gains are significant and should not be discouraged by the expense of a full building upgrade.

For questions about whether this code interpretation applies to your project:

- If you have submitted a permit application, contact the Building Code plan reviewer assigned to your application.
- If you have not submitted an application, send us a question through the SDCI website www.seattle.gov/sdci/resources/send-us-a-question or in person at the Applicant Services Center.
- Visit the Applicant Services Center website for more information about hours and location www.seattle.gov/sdci/about-us/who-we-are/applicant-services-center