

April 10, 2012

CALIFORNIA ENERGY COMMISSION  
Attention: Docket No. 12-BSTD-1  
Dockets Office  
1516 Ninth Street, MS-4  
Sacramento, CA 95814

<b>DOCKET</b>	
<b>12-BSTD-1</b>	
DATE	APR 10 2012
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Submitted via email to [DOCKET@energy.state.ca.us](mailto:DOCKET@energy.state.ca.us)**Re: Docket No. 12-BSTD-1**

Dear Energy Commissioner:

The Center for the Polyurethanes Industry (CPI) of the American Chemistry Council (ACC)<sup>1</sup> writes to express concern regarding the proposed updates to the Energy Efficiency Building Standards of Title 24 Part 6 envelope provisions. CPI is concerned with the proposed wall insulation values in the 45-day language currently under consideration. Specifically, we are opposed to the proposed combinations of continuous and cavity options in Table 150.1-A for wood-frame walls.

The proposed changes to the prescriptive R-Values could have the effect of reducing the number of choices that builders and homeowners can choose to achieve the R-Value requirements. The limited insulation choices that can prescriptively achieve the new R-Values may have an adverse impact on builders and homeowners without any positive ramifications to warrant the proposed change. CPI opposes the changes for the following reasons:

1. **R4 Continuous Insulation:** The R-Value for continuous insulation used in wood-frame walls is set at R-4 across all climate zones.
  - The decrease in wood-frame wall U-Values includes an increase in the cavity insulation to either R-15 or R-21. By not including an option for additional R-Value added by continuous insulation, the table could unfairly limit cavity options to only R-15 or R-21. Increasing the continuous insulation R-Value is likely to allow the use of a broad range of cavity insulation products.
  - The proposed prescriptive insulation level misses another opportunity to reduce the likelihood of condensation within the wall cavity by using less continuous insulation
  - The model code IECC residential energy requirements (2012 IECC) use R-5 and R-10 options for continuous insulation. The proposed R-4 insulated sheathing could become a specialty “California” product that could adversely impact our industry, which does not produce R-4 sheathing on a large commercial scale.

<sup>1</sup>The Center for the Polyurethanes Industry (CPI) of the American Chemistry Council promotes the sustainable growth of the polyurethanes industry. CPI members are U.S. producers or suppliers of chemicals and equipment used to make polyurethane or manufacturers of polyurethane products ([www.americanchemistry.com/polyurethane](http://www.americanchemistry.com/polyurethane)).



2. **R15 and R21 Cavity Insulation:** The only options within Table 150.1-A for prescriptive cavity insulation are R-15 and R-21.
- Current standard-density fiberglass and cellulose insulation cannot meet R-15 cavity requirements in 2x4 framing and R-21 requirements in 2x6 framing. For fiberglass to be used, high-density fiberglass would be required instead of possibly less expensive alternatives such as standard density fiberglass.
  - Selection of these increased cavity R-Values would also limit the type of spray foam that can be used as cavity insulation. Open cell spray foam products, like standard density fiberglass and cellulose insulations, could be eliminated under the proposed values.
  - Selection of performance grades that are not based on the most commonly commercially available materials, without an energy efficiency benefit, could be an inefficient and potentially costly alternative to currently available materials.
3. **Preferential Materials Use:** The draft requirements currently include an unnecessary bias toward specific technologies to the exclusion of others that are commonly used in the marketplace. Specifically, open cell spray foam, along with other commonly used insulation technologies, that do not achieve an R-15 in a 2x4 wall or R-21 in a 2x6 wall could be adversely impacted.

The proposed changes in Table 150.1-A in the 45-day language could reduce the availability of choices and likely impact the marketplace. CPI recommends that the CEC use R-13+5ci and R-19+R-5ci corresponding to the climate zones in California currently. These simple changes would allow frequently used insulation technologies already available and in wide use across the nation to continue to be a consideration under prescriptive requirements for California's builders and homeowners.

If you have any questions about these comments, please contact Chris Braddock on my staff at [Chris\\_Braddock@americanchemistry.com](mailto:Chris_Braddock@americanchemistry.com) or at 202-249-6617.

Sincerely,



Lee Salamone  
Senior Director  
Center for the Polyurethanes Industry  
American Chemistry Council

