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VIA ELECTRONIC MAIL: Docket@energy.ca.gov

April 10, 2012

California Energy Commission
Attention: Docket No. 12-BSTD-1
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: Comments of the California Energy Efficiency Industry Council on Revisions to the California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 1 and Part 6 (Docket No. 12-BSTD-1)

To Whom It May Concern:

NAIMA is the association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation through the use of fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials. These comments are submitted in strong support of the 2013 proposed revisions to California Title 24.

General Comments:

NAIMA recognizes the numerous benefits resulting from improvements to the building envelope. The energy efficiency improvements in the rulemaking include greater efficiency of the opaque envelope with increases in the R-value requirements and decreases in the U-factors for fenestration. The energy savings resulting from these revisions will benefit the public by:

- Reducing the amount of greenhouse gas and other emissions from generation of electricity;
- Reducing utility bills;
- Reducing peak demand on the electrical grid; and,
- Creating jobs in the energy efficiency and construction sectors .

Specific Comments:

NAIMA supports the proposed mandatory minimum insulation levels being proposed for non-residential construction and the trade-offs for additions and alterations. NAIMA also supports the proposed tradeoff which allows roof materials, which otherwise could not meet the new "cool roof" requirements, to be used with greater insulation levels.

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NAIMA strongly supports the proposed revision to the residential energy efficiency requirements proposed in the rulemaking. A review of the new roof deck insulation requirements, when added to the standard attic insulation requirements, shows a good opportunity for additional saving energy in homes. This under deck insulation when added to the proposed increase in the mandatory ceiling insulation level from R19 to R30 will further augment the savings. Additionally, the methods and materials for insulating under roof decks is currently available and in use.

The most beneficial improvements proposed are the increases in the opaque wall requirements. The best opportunity to build highly efficient and cost-effective walls occurs when a home is built. Trying to add insulation to walls after they are built can be costly and depending on the wall construction may be difficult or impractical. NAIMA supports the R4 exterior insulation requirement, as well as the R15/R21 wall requirements. There are numerous insulation products and methods available to meet these proposed levels.

The proposed increase in duct and pipe insulation levels are also supported by the members of NAIMA. Pipes and ducts typically convey water and air at much higher and/or lower temperatures than the ambient conditions in which they are located. These large temperature differences justify greater insulation levels and will not only save energy but make the duct and pipe systems less likely to experience condensation. Insulating hot water pipes will result in water savings by reducing the wait time to deliver hot water to the user. Furthermore increased duct insulation will help deliver air to the spaces they supply at the design temperature – reducing the likelihood of users increasing or decreasing the thermostat set points in order to make the room they are in comfortable. NAIMA urges the Commission to upgrade the duct insulation requirements to R-8 for all ducts in unconditioned space as originally proposed. Having one requirement statewide will make code enforcement easier, supply simpler and most importantly save more energy. The International Energy Conservation Code currently requires R-8 duct insulation on all ducts located in attics.

All these proposed improvements, as well as the other revisions to Title 24, will result in increased energy savings and comfort for the people working and living in these homes and buildings.

Thank you for your consideration of these comments and please contact me if you have any questions.

Sincerely,



Charles C. Cottrell
Vice President, Technical Services