

April 24, 2012

CALIFORNIA ENERGY COMMISSION
 Dockets Office
 1516 Ninth Street, MS-4
 Sacramento, CA 95814-5512

Re: Docket Number 12-BSTD-01

Dear CEC Staff:

We appreciate the opportunity to provide comments on the proposed language for the 2013 Building Energy Efficiency Standards. This comment addresses the use of clear and consistent terminology throughout CA's BEES.

Like ASHRAE 90.1 and the International Energy Conservation Code, BEES typically uses the phrase, "continuous insulation" as the term for insulation that is outboard of the structural framing of an envelope assembly. In one case within Title 24 Part 6, however, BEES also uses the phrase, "continuous insulated sheathing" (within Table 150.1-A, footnote 4) and has also carried over the definition of "insulating sheathing" from the 2008 edition of BEES.

For consistency within BEES and for consistency with other relevant codes and standards in the industry (e.g., IECC and ASHRAE 90.1), references to "insulating sheathing" and "continuous insulated sheathing" should be replaced with the term, "continuous insulation". This would involve the following changes within the Title 24 Part 6 45-day language. Note that the definition of "insulating sheathing" is recommended for deletion since it would no longer be referenced anywhere within BEES.

- SECTION 100.1 – DEFINITIONS AND RULES OF CONSTRUCTION
~~INSULATING SHEATHING~~ is an insulating board or sheet material that: (a) is (i) applied to the exterior or interior of the building envelope, or (ii) integral with the exterior finish material; (b) has a core minimum R-value of R-2; and (c) is installed continuously across framing assemblies, where those framing assemblies separate conditioned from unconditioned space.
- Table 150.1-A, Footnote 4:
 4. "R-15+4" means R-15 cavity insulation plus R-4 continuous ~~insulation insulated sheathing~~.

Further, the definition of continuous insulation in Section 100.1 introduces a new term, "insulated siding". Addition of this term is welcomed, as it is in line with the International Energy Conservation Code, and provides users with greater flexibility to meet the continuous insulation requirements of the code. For users who are unfamiliar with this product class, however, some clarification is recommended for this new term. The following definition, which is similar in form to the orphaned definition of "insulating sheathing" is offered:

- INSULATING SIDING is an insulating cladding that: (a) is (i) applied to the exterior of the building envelope and (ii) integral with the exterior finish material; (b) has a minimum R-value of R-2; and (c) is installed continuously across framing assemblies, where those framing assemblies separate conditioned from unconditioned space.

Thank you for the opportunity to provide these comments.

Sincerely,

Mike Moore

Mike Moore, P.E.