

**Docket No. 12-BSTD-1 CIMA comments to CA's 2013 Title 24, Part 6
Building Energy Efficiency Standards**

Ware, David@Energy

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To: cima@cellulose.org

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Daniel Lea

Secretary and Executive Director

CIMA

Dear Mr. Lea:

Thanks for your letter regarding CIMA's concerns for possible changes to the 2013 Standards. We've reviewed the information you've provided in your letter dated April 10th, including the research information provided by ORNL for a similar concern put forward in the development of revisions for the recent updates to the IECC.

We have been working closely with other insulation industry groups and our proposed revisions to California's energy code continue to be refined. We expect to make the 15-day revisions available to the public shortly. At this time we are proposing to express the residential prescriptive wall R-value requirements as R15+4 or R13+5 with an equivalent U-value. Consideration is being given to dropping our proposed R21+4 in the more extreme California climate zones. The prescriptive requirements, like those of the IECC, determine the standard design energy budget for which the proposed design building is compared against when showing compliance through the performance approach of computer modeling. To this end, all climate zones will specify a maximum U-value of 0.065 and a minimum R-value of R15+4 or R13+5.

I believe these current proposed changes adequately address your industry's concerns.

Sincerely,

David W Ware

California Energy Commission

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