

FW: Notice of Hearing for Possible Adoption

Yasny, Ron@Energy

Sent: Monday, May 21, 2012 10:39 AM**To:** Energy - Docket Optical System**Categories:** Ready to Process**DOCKET****12-BSTD-1**DATE MAY 21 2012RECD. MAY 21 2012

Please docket 12-BSTD-1 ww(15day)

From: Bozorgchami, Payam@Energy**Sent:** Monday, May 21, 2012 10:36 AM**To:** Mike Moore**Cc:** Yasny, Ron@Energy**Subject:** RE: Notice of Hearing for Possible Adoption

Mike Moore

Newport Ventures

Thanks for your letter of May 16th suggesting changes to the definition of “continuous insulation (ci)” in Section 100.1 of the proposed 2013 Building Energy Efficiency Standards (Standards). Your suggestions are useful but we don’t believe they meet the full intent of what’s being conveyed by the current language. Definitions and the requirements within the Standards themselves are not necessarily meant to be totally encompassing, rather to specify the characteristic of what’s being intended in a manner that’s understood by users of the Standard. To this end, many of the “nuts and bolts” of individual requirements get more fully expressed in complementary documents, such as the Reference Appendices, Residential and Nonresidential Compliance Manuals, and the Residential and Nonresidential Alternative Calculation (ACM) Approval Manuals. In addition, in conjunction with training we provide other written materials to support various elements of compliance, such as Fact Sheets and Blueprints to cover specialized aspects of building energy use and compliance.

In some cases, definitions can help corral what is the intent of elements of the requirements specified in the Standards. However, for other situations definitions are useful for helping provide structure for the overarching intent of a given requirement.

- We purposely excluded references in this definition to building sheathing or insulated siding to allow more product types to be allowed for use and innovations that may come forward in the future. For example, our proposed definition would account for spray foam systems, commonly used in below grade and roof applications; but your proposed revisions would not.
- We removed the reference implying R-2 as this detail is somewhat irrelevant to what is being defined. JA4 tables for R-values and U-factors in the 2008 Standards are, for the most part, set up with R-2 increments of insulated sheathing. However, the proposed 2013 Standards have many examples in tables where increments of R-1 are used. As long as an insulation product has been certified to the state and listed by the Bureau of Home Furnishings and Thermal Insulation as an “insulation material” we are obligated to allow its use. While we agree that to be useful a product type being purchased for continuous insulation ought to have a minimum R-value of R-2, this is not a prerequisite for use with the Standards. Note, ASHRAE 90.1 and 90.2 also do not specify continuous insulation to be R-2.
- It is not necessary to express every nuance that a given installation may encounter in the field to ensure the intent is clearly understood. Our proposed definition expresses that to be “continuous” the insulation separates assemblies from conditioned and unconditioned space and only fasteners or other mechanism is needed to assure its proper installation and ultimate usefulness. It’s understood that buildings will have openings in their exterior surface for doors, windows, and for necessary electrical and piping—hence, “service openings.”

I trust this information is helpful. We appreciate your input and support of the Standards.

Regards,
Payam

Payam Bozorgchami, P.E.
Associate Civil Engineer
California Energy Commission
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From: Mike Moore [mailto:mmoore@newportpartnersllc.com]
Sent: Thursday, May 17, 2012 4:18 AM
To: Bozorgchami, Payam@Energy
Subject: RE: Notice of Hearing for Possible Adoption

Thanks for the notice, Payam, which was very considerate. I will submit the attached comment to the commission this morning, but wanted to provide you with a courtesy copy first.

Best regards,

Mike

Mike Moore, P.E., LEED AP | Newport Ventures, Inc.
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From: Bozorgchami, Payam@Energy [mailto:Payam.Bozorgchami@energy.ca.gov]
Sent: Wednesday, May 16, 2012 10:38 AM
To: Mike Moore
Subject: Notice of Hearing for Possible Adoption

Hello Mr. Moore,

Just an FYI if you did not get the message.

Regards,
Payam

Notice of Hearing for Possible Adoption of
2013 Proposed Building Energy Efficiency Standards and Proposed Negative Declaration

Availability of 15-Day Language and
Opportunity for Comment

The California Energy Commission will conduct a hearing to adopt the proposed update to the Building Energy Efficiency Standards in the California Code of Regulations, Title

24, Part 6, associated administrative regulations in Part 1 (collectively also known as the California Energy Code), and portions of the Green Building Code, Part 11 (also known as CalGreen), of the California Building Code. The Energy Commission will also consider the proposed and supplemental Initial Study and Negative Declaration.

Concurrent with this notice, the Energy Commission has also published modifications to the proposed Standards that were previously made available for public comment, and identified additional documents it will rely upon for adoption of these Standards. The modifications to the proposed Standards are known as the "15-Day Language" and are the proposed revisions to the California Energy Code and CalGreen that the Energy Commission will consider adopting.

May 31, 2012

9:00 a.m.

CALIFORNIA ENERGY COMMISSION
1516 Ninth Street 1st Floor,
Hearing Room A Sacramento,
California Wheelchair Accessible

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