

COALITION FOR FAIR ENERGY CODES
AMERICAN WOOD COUNCIL
APA-THE ENGINEERED WOOD ASSOCIATION

DOCKET

12-BSTD-1

DATE MAY 30 2012

RECD. MAY 30 2012

May 30, 2012

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
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Re: Docket No. 12-BSTD-1

Adoption of 15-Day Language for the 2013 Energy Efficiency Building Standards

The Coalition for Fair Energy Codes has reviewed the proposed 15-day language for Title 24 Part 6 and offers the following comments and recommendations:

1. Comment on Newport Ventures, 15-day comment date 5/16/12: We are in support of the 15-day comment registered by Payam Bozorgchami in response to Newport Ventures proposed revision. The purpose of the code is to fundamentally ensure energy conservation but not unnecessarily diminish the design flexibility of architects, engineers and contractors. If the comment by Newport Ventures is adopted, design professionals will have further limitations placed on them when continuous insulation materials are artificially restricted, by definition, to R-2. This limiting language does nothing to further energy efficiency; it just excludes some building products. If materials have insulating value and are continuous, there is every reason to allow the credit.
2. It is not clear in Table 150.1-A that a 2x6 wall with R-19 batt insulation is permitted in every climate zone. The provisions of Sections 150.0 and 150.1 are clear that this is the minimum assembly prescribed. A user that goes directly to Table 150.1-A for prescriptive assemblies will not find a reference to the 2x6 wall solution. At a minimum, we are requesting that a footnote be added to Table 150.1-A to clarify the permitted use of 2x6 assemblies. Additionally, please consider adding a row to the table just above the 2x4 row that shows for 2x6 walls, the use of R-19 is acceptable.

Footnote requirements to TABLE 150.1-A:

1. Note addition of “/or” and “~~R-13+5 2X6 studs with R-19 batts~~” in second paragraph:
U-factors can be met by cavity insulation and/or continuous insulated sheathing that results in a U-factor equal to or less than the U-factor shown. “R-15+4” means R-15 cavity insulation plus R-4 continuous insulated sheathing. Any combination of cavity insulation and/or continuous insulated sheathing that results in a U-factor equal to or less than 0.065 is allowed, such as ~~R-13+5 2X6 studs with R-19 batts~~. Continuous insulated sheathing is not required for demising partitions, such as exterior walls adjacent to an unconditioned garage.

We appreciate the opportunity to provide comments on the 15-day language and look forward to working with the CEC to help develop the best possible energy code for California. Please feel free to contact me at tom.kositzky@fairenergycodes.org if CEC can be of assistance in addressing these comments.

Respectfully submitted,

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