October 31, 2014

To: California Energy Commission

RE: Public Comments on Docket 14-BSTD-01
2016 Building Standards Update

Subject: Attic entry hatch insulation

Currently the only requirement for attic entry hatch insulation is that the insulation be of the same value as the other attic insulation and be fastened in such a way that it will cannot come loose and that it has a seal of some sort.

As a HERS rater and home inspector I have rarely found insulation attached to the hatch. Either it has come loose or was never applied; even with new blown-in insulation is present.

I believe that the hatch can be configured to meet and exceed these requirements and last for the life of the other insulation or longer. There are units available now and in testing than can provide this long lasting insulation. These units can easily be inspected by any building inspector, home inspector, or HERS rater and will always meet or exceed CEC requirements.

I would appreciate an opportunity to meet with a CEC committee to provide documentation on these units and show the benefit to the insulating capacity of the attic to the conditioned space in residential units.

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