



438 Main Street, Suite 100, Buffalo, NY 14202-3207  
Toll Free: 800.758.7325 • Fax: 905.363.0102 • [www.icynene.com](http://www.icynene.com)

Nov 17, 2014



Sent via email to: [docket@energy.ca.gov]

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento CA 95814-5512  
Attn: Mazi Shirakh

**RE: Docket No. 14-BSTD-01 - 2016 California Title 24 Update Process: November 3<sup>rd</sup> Hearing**

To Whom it May Concern,

Icynene Corporation is a leading manufacturer of spray foam insulation products for the construction industry. Icynene is owned by FFL Capital of San Francisco California. To the best of our knowledge there are more than 1million homes in the USA insulated with Spray foam so as to provide an unvented attic. Our estimate is that more than 400,000 are insulated with Icynene products.

Icynene appreciates the opportunity to provide comment regarding the November 3<sup>rd</sup> hearing on the California Energy Commission's ("Commission") 2016 Title 24 Update Process. We are encouraged to see the emphasis on using roof-deck insulation to reduce attic temperatures and improve the efficiency of California homes, and we support the Commission's efforts to make High Performance Attics (HPAs) part of the Title 24 Standards. Spray foam insulation is a tested and proven method for creating HPAs; a method which provides a combination of insulating and air sealing benefits not found in other technologies.

In order to achieve maximum benefit from below-roof-deck application of spray foam, the attic should be unvented to prevent the movement of unconditioned air into the attic and home. However, unvented attic (UVA) designs were notably absent from the HPA presentation delivered on November 3<sup>rd</sup>. This omission is of great concern to (organization), as unvented attics had been highlighted as a prescriptive compliance option in earlier presentations, such as the one delivered by the same presenter on July 21<sup>st</sup>.

**THE EVOLUTION OF INSULATION™**

In the July 21<sup>st</sup> code hearing, spray foam UVAs were presented alongside vented above-deck rigid foam insulation and below-deck fiberglass/cellulose attics as proposed compliance options. We believe that Spray foam is the preferred option. As a Code Prescribed Air Impermeable Insulation it offers both Building Science and Energy Efficiency benefits.

In response to a question from the audience, the presenter stated that unvented designs would still be a performance option for meeting the code. However, as of now the compliance software does not allow the user to model a “conditioned” or “unvented” attic, so early-adopters looking to build highly efficient homes and to get out ahead of the 2016 code will likely be compelled to look to other technologies.

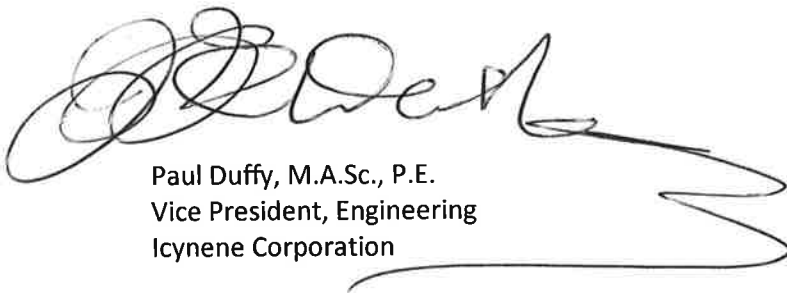
The rationale for why unvented attics were removed from consideration as a prescriptive compliance option was not clearly communicated during the presentation. We know that competing technologies made representations to the commission regarding Spray foam. We suggest that the information they provided was not unbiased and would like an opportunity to defend our products.

By now you should be aware that an unvented attic insulated with Spray foam insulation has been a Code-compliant alternative in the ICC for more than 10 years. Leading technical authorities have researched this technology thoroughly which led to the USDOE successfully submitting the provisions for unvented attics in the Energy Codes. Our products in particular have been marketed for more than 25 years and have a long history of delivering superior performance.

We respectfully request the Commission’s assistance in helping our industry understand why UVA designs were not included in the November 3<sup>rd</sup> hearing and what can be done to include UVAs as a prescriptive option.

Icynene Corp. and other industry stakeholders would be happy to provide the Commission with any data or information on unvented spray foam attics that could assist with the development of inclusive regulations to save energy in California homes. We appreciate the opportunity to contribute to the code update process and look forward to a continuing conversation with staff as the Commission develops language for the 2016 Standards.

Yours truly,



Paul Duffy, M.A.Sc., P.E.  
Vice President, Engineering  
Icynene Corporation