

RTE

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November 24, 2014
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED**14-BSTD-01**

TN 74059

NOV 25 2014

Subject: Requesting change to Title 24 – Part 6 Section 120.7(b)7

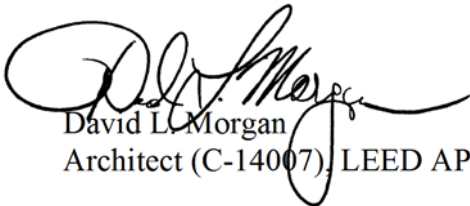
The language provided in Section 120.7(b)7 permits the use of R-13 insulation in demising walls between metal studs with a resulting U-Factor of 0.203-0.217 based on stud spacing. This is in direct conflict with Section 120.7(b)2 limiting the U-Factor in metal framed wall assemblies to 0.105 between conditioned and unconditioned spaces.

The following modification would address this conflict.

Section 120.7(b)7: Demising walls – The opaque portions of the framed demising walls shall be insulated with an installed R-Value no less than R-13 between framing members, and shall have a U-Factor no greater than 0.105.

I respectfully request the Energy Commission staff consider the modification provided above when preparing the 2016 Building Energy Efficiency Standards.

Sincerely,



David L. Morgan
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