

To: California Energy Commission
RE: 2016 Building Standards Update
Docket # 2014-BSTD-01

From: Rosemary Howley

Here are my comments on a few sections of the new code that I believe need clarification:

Prescriptive Requirements for Nonresidential/High-Rise Residential/Hotel-Motel Alterations

Sections 141.0(b)1 and 2: RE: Prescriptive Insulation Requirements for Alterations

There has been some confusion about what insulation is required when showing prescriptive compliance for nonresidential alterations.

Section 141.0(b)1 shows “Mandatory Insulation Requirements”, but I believe that these are also the prescriptive insulation requirements for alterations, but that is not clearly stated in Section 141.0(b)2. Please add clarification that the mandatory insulation requirements from section 141.0(b)1 are also the prescriptive alteration insulation requirements.

Exception to Section 141.0(b)1B: Light and Heavy Mass Walls

What do you mean by this? If you mean that light and heavy mass walls meet the same mandatory requirements as 120.7(b), then please say that. If you mean that there are no requirements for those walls, then please say that. In either case, then you also need to clarify what the prescriptive alteration values would be for light and heavy mass walls.

Section 141.0(b)2liiib

Need more clarification on what you mean by changing the light source of the luminaire. It should not include something that is equivalent to changing the light bulb in a screw-in or pin-based light fixture from incandescent to LED. Changes of that kind are unlikely to be reliably permanent, and it is also unreasonable to expect the building industry to obtain building permits for that kind of lighting alteration.