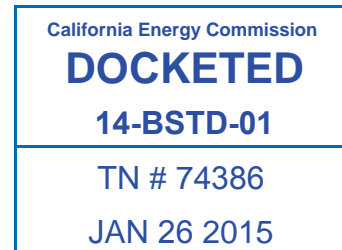


January 26, 2015

To: Commissioner Andrew McAllister
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Docket: 14-BSTD-01



From: Robert Broad, PulteGroup West Zone Director of Purchasing

RE: Draft 2016 Building Energy Efficiency Standards

Dear Commissioner McAllister:

PulteGroup is a large production home building company that builds throughout California operating under the Pulte Homes, Centex Homes, and Del Webb brands. PulteGroup follows the development of building codes through our affiliation with the California Building Industry Association (CBIA).

We have been informed that comments by JCEEP into the 2016 Building Energy Efficiency Standards proposed to severely limit the use of flexible duct in new residential construction. We are extremely concerned and strongly object to the flex duct limiting proposal by JCEEP. All of the homes PulteGroup builds use flex duct for our HVAC systems. In addition, our HVAC systems are tested by the HVAC subcontractor and a HERS rater to verify their performance.

Over the past numerous regulatory cycles the duct tightness and performance of HVAC systems have vastly improved. Any suggestion to limit flexible ducts which are an integral portion of a well-designed and field verified HVAC system is not acceptable to the building industry.

PulteGroup opposes any reduction or limitation to the use of flexible duct. It is the methodology the building industry uses to supply quality HVAC systems to our homes.

Respectfully,

Robert Broad
Director of Purchasing

cc: Rob Oglesby, CEC Executive Director
Dave Ashuckian, CEC Deputy Director of the Efficiency & Renewable Energy Division
Patrick Saxton, CEC Advisor to Commissioner McAllister
Mazi Shirakh, CEC lead staff for 2016 Standards
Robert Raymer, CBIA Technical Director