January 26, 2015

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

From: Halsell Builders, Inc.

Docket: 14-BSTD-01

California Energy Commission

DOCKETED

14-BSTD-01

TN # 74387

JAN 27 2015

RE: Draft 2016 Building Energy Efficiency Standards

Dear Commissioner McAllister:

Halsell Builders, Inc. is a small construction company located in Santa Maria, CA that builds less than 40 homes per year. We were established in 2002 and build throughout Santa Barbara and San Luis Obispo Counties. Halsell Builders, Inc. 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 propose to severely limit the use of flexible ducts in new residential construction. We strongly object to the flex duct limiting proposal by JCEEP. All of the homes Halsell Builders, Inc. 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.

Halsell Builders, Inc. opposes any reduction in the use of flexible duct. It is the methodology the building industry uses to supply quality HVAC systems to our homes.

Respectfully,

Joseph R. Halsell President/ CEO

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