



California Energy Commission

DOCKETED

14-BSTD-01

TN # 74477

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VIA E-MAIL

February 6, 2015

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

RE: Draft 2016 Building Energy Efficiency Standards (BEES), Docket # 14-BSTD-01

Dear Commissioner McAllister:

NAIMA is the association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation through the use of fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials. The purpose of this letter is to state our strong opposition to the Joint Committee on Energy and Environmental Policy (JCEEP) proposed amendments to the draft 2016 Building Energy Efficiency Standards which would limit the use of flexible duct in construction.

Most residential and light commercial HVAC systems use flexible duct products. The JCEEP stated the reason for the proposed limit was due to pressure loss and improper installation of flexible duct products. All building products can be installed poorly, which is why NAIMA and its members support the California Energy Commission (CEC) in the development of installation standards, inspections and testing protocols to ensure all products, including flexible ducts, are properly installed. In the past NAIMA supported the CEC's development of videos detailing the proper installation of fiber glass insulation.

The 2013 Building Energy Efficiency Standards (BEES) require duct systems to be inspected and tested to meet the minimum requirements. HVAC duct systems are tested by the subcontractor installing the system, as well as a certified Home Energy Rater System (HERS) rater using the CEC protocols for testing and quality control. These mandatory performance requirements can only be met if the system is performing properly and meets the quality standards outlined in the BEES.

NAIMA strongly objects to JCEEP's proposal which disregards the Commission's quality installation guidelines and test requirements. Limiting flexible duct runs in residential and small commercial buildings to a maximum length of 5 feet is completely arbitrary and unjustified. The California building industry should continue to have the cost-effective choice to use flexible duct products, without restriction, provided they are properly installed, inspected and tested to meet the BEES requirements.

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NAIMA supports the development of the 2016 Standards without this arbitrary restriction on flexible ducts. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles C. Cottrell". The signature is fluid and cursive, with the first name being the most prominent.

Charles C. Cottrell

Vice President, Technical Services

cc: Rob Oglesby, CEC Executive Director
Dave Ashuckian, CEC Deputy Director of the Efficiency & Renewable Energy Division
Patrick Saxton, CEC Advisor to Commissioner McAllister
Maziar Shirakh, CEC