

DOCKETED

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Comment Received From: Elaina Carpino

Submitted On: 7/31/2015

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2016 Residential Compliance Manual and Documents

Additional submitted attachment is included below.



July 31, 2015

CALIFORNIA ENERGY COMMISSION
 Dockets Office, MS-4
 Re: Docket No. 15-BSTD-02
 1516 Ninth Street
 Sacramento, CA 95814-5512

Re: California Energy Commission – Residential Compliance Manual Comments

CEC Staff,

Owens Corning would like to thank the Energy Commission for maintaining an open and collaborative process for the development of the Residential Compliance Manual. We appreciate the opportunity to provide comments and concerns regarding this draft.

Our main concern regarding this draft of the Residential Compliance Manual that needs to be addressed is there is not enough language devoted to alternative methods for compliance with the High Performance Attic (“HPA”) requirement. Based on our experience working with builders who use our product and competitor’s products, the shift to HPA’s will be a significant change in their construction practices, and explicit language in the manual with examples of various configurations and attic assemblies is imperative to help the industry move to HPA’s. Specifically, the section on Advanced Assembly Systems in Chapter 3 has only a few paragraphs and one very generic diagram.

In addition, there is a need to accurately account for thermal bridging in draped insulation versus no thermal bridging in boxed netting. The table below was developed in cooperation with and with input from CEC staff in 2014 and it would be appropriate to include this in the Manual.

Draped Insulation U-Factors

R-Value	Cavity R-Value for the Roof	Average R-Value for Draped Insulation	Cavity R-Value for the Ceiling	Roof/Ceiling Total R-Value	Roof/Ceiling U-Factor
19	14.563	4.65	1.383	20.595	0.0486
22	14.563	7.44	1.383	23.385	0.0428
30	14.563	14.88	1.383	30.825	0.0324
38	14.563	22.32	1.383	38.265	0.0261
42	14.563	26.04	1.383	41.985	0.0238
49	14.563	32.55	1.383	48.495	0.0206

Boxed Insulation U-Factors

R-Value	Cavity R-Value for the Roof	Continuous R-Value for Under Roof Deck Insulation	Cavity R-Value for the Ceiling	Roof/Ceiling Total R-Value	Roof/Ceiling U-Factor
19	14.563	5.00	1.383	20.945	0.0477
22	14.563	8.00	1.383	23.945	0.0418
30	14.563	16.00	1.383	31.945	0.0313
38	14.563	24.00	1.383	39.945	0.0250
42	14.563	28.00	1.383	43.945	0.0228
49	14.563	35.00	1.383	50.945	0.0196

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Owens Corning is willing to provide material to augment the language, diagrams, etc., currently present in the Manual.

Regards,

A handwritten signature in blue ink, reading "Elaina Carpino", enclosed in a thin black rectangular border.

Elaina Carpino
Product Manager, Insulation