

## DOCKETED

<b>Docket Number:</b>	15-BSTD-02
<b>Project Title:</b>	Residential Compliance Manual and Documents
<b>TN #:</b>	205785
<b>Document Title:</b>	Knauf Insulation Comments
<b>Description:</b>	Comments on 2016 Residential Appendices
<b>Filer:</b>	Adrian Ownby
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	8/20/2015 10:51:44 AM
<b>Docketed Date:</b>	8/20/2015

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California Energy Commission <b>DOCKETED</b> <b>15-BSTD-01</b>
<b>TN # 76FHG</b> <b>AUG FJ 2015</b>

August 5, 2015

RE: 2016 RESIDENTIAL APPENDICES TO PART 6—Docket 15-BSTD-01

Knauf Insulation manufactures glass mineral wool insulation products for building envelopes, acoustics and sound attenuation purposes, mechanical air delivery systems, and pipe and industrial applications. These materials are produced with industry leading environmental qualities and carry third-party validations for their performance quality and sustainable attributes.

Please accept the following comments as documents provided under Docket 15-BSTD-02 and Docket 15-BSTD-04 were not available for public review at the time of this docket to ensure consistency and continuity of language and intent.

**2016 Residential Appendices to Part 6**

- RA4.6.1 Photovoltaic Systems
  1. Provide specific language related to eligibility criteria for PV solar to be consistent with language Residential Compliance Manual and Residential ACM Reference Manual:

When photovoltaic (PV) system performance is used in the performance compliance approach as specified in the Residential ACM Reference Manual, the PV system shall meet the eligibility criteria in (a) or (b).

(a) PV systems meeting all requirements of the NSHP Guidebook:

1. PV system credit cannot be taken for compliance demonstrated through whole building analysis; or,

(b) PV systems meeting all of the following requirements:

1. PV system credit cannot be taken for compliance demonstrated through whole building analysis.

~~2.~~ The PV modules and inverter(s) meet the equipment eligibility requirements in the NSHP Guidebook.

~~3.~~ The PV system nameplate DC power rating, measured under Standard Test Conditions, is no less than 2000 watts.

~~4.~~ The PV array is installed at a slope no greater than 2.4 degrees from the horizontal (ratio of rise to run no greater than 0.5:12); or, the PV array is installed at a slope no greater than 30.3 degrees from the horizontal (ratio of rise to run no greater than 7:12) and with an orientation between 110 degrees and 270 degrees of true north.

~~5.~~ The PV system is equipped with a system energy production meter that is integral to the inverter, a standalone system energy production meter, or an energy production monitoring system.

**65.** Any obstruction that projects above a PV array shall be located at least twice the distance, measured in the horizontal plane, of the height difference between the highest point of the obstruction and the horizontal projection of the nearest point of the PV array, measured in the vertical plane.

**76.** Prior to occupancy of the building, the building inspector shall confirm that PV system is operational.

Sincerely,

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

David W. Ware, CSI, CDT, LEED GA  
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