

DOCKETED

Docket Number:	17-BSTD-01
Project Title:	2019 Building Energy Efficiency Standards PreRulemaking
TN #:	220440
Document Title:	Re CEC Proposed Code Language Small Duct High Velocity- Docket Number 2017-BSTD-01
Description:	N/A
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Submitter Role:	Public
Submission Date:	7/28/2017 11:59:44 AM
Docketed Date:	7/28/2017



C . A . S C H R O E D E R , I N C .

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July 28, 2017

To: California Energy Commission

Re: CEC Proposed Code Language

Small Duct High Velocity – Docket Number 2017-BSTD-01

C.A. Schroeder, Inc. dba: Casco appreciates this opportunity to provide feedback to the California Energy Commission's consideration to propose code language for Small Duct High Velocity Forced Air Systems.

Most manufacturers of these small duct high velocity systems assemble their air duct using an interior core material comprised of Spun Bonded Non-Woven Nylon. Using this material is essential to the small duct high velocity systems ability to provide its acoustical properties. The Spun Bonded Nylon is made of a porous material that will absorb the noise generated by the high velocity forced air through the porous core liner and then the fiberglass insulation will muffle the sound.

Our concern with this code language is that the current code language under **“Porous Inner Core Flex Duct”** states: Flexible ducts having porous inner cores shall not be used. If the proposed code language for Small Duct, High Velocity Central Forced Air Systems is to be considered, Casco feels that the current section prohibiting porous inner cores should be removed to avoid conflict and confusion.

Thank you again for this opportunity to comment on the 2019 code.

Best regards,

William Griffith
General Manager