

DOCKETED

Docket Number:	17-BSTD-01
Project Title:	2019 Building Energy Efficiency Standards PreRulemaking
TN #:	221878
Document Title:	QC Manufacturing, Inc. Comment on Whole House Fans Insulated Dampers
Description:	Comment submitted by Staff for Andy Llorca and Dane Stevenson, QC Manufacturing, Inc.
Filer:	Adrian Ownby
Organization:	QC Manufacturing, Inc.
Submitter Role:	Public
Submission Date:	11/30/2017 4:39:48 PM
Docketed Date:	11/30/2017

November 20, 2017

Mr. Todd Ferris
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket: 17-BSTD-01 WHF HERS Verifications

Submitted by: Andy Llorca / Dane Stevenson

QC Manufacturing, Inc.

Subject: Damper box insulation ratings for whole house fans used for Title 24, Part 6 compliance.

Issue:

In 2013 we had a measure 4.507.1 that required whole house fans, when installed, to have a minimum of R-4.2 on the damper system. This was repealed in 2013 code for CalGreen Title 24, part 11.

Here is the official notice:

REPEALED: Section 4.507.1 Openings (for whole house fans) has been repealed. There is no substitute language.

Link is available here:

<https://www.documents.dgs.ca.gov/bsc/documents/2013/2013-green-residential-mandatory.pdf>

Comments:

Having uninsulated dampers is a weakness in the thermal envelope, and we are uncertain why this measure was removed from CalGreen. We are surmising that since CalGreen focuses more on sustainable design, this energy related requirement was repealed from Part 11.

Proposed Solution:

We are requesting the staff at the CA Energy commission please consider adding this requirement to sections 150.1.12(c).12 as a subitem D. Here is some example language that can be used:

C. Append “; and” to the end of subitem C.

D. Whole house fans installed for compliance must have a minimum of R4.2 on the damper system.

QC Manufacturing, Inc. appreciates the Energy Commission’s consideration of these comments and looks forward to collaborating with the Energy Commission and stakeholders as these standards are further developed. Please do not hesitate to contact me at (209) 342-9482 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,

Andy Llorca

QC Manufacturing, Inc.