



June 20, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET	
10-BSTD-1	
DATE	JUN 20 2011
RECD.	JUN 20 2011

Re: June 21, 2011 Staff Workshop–2013 Building Energy Efficiency Standards

R-Values of Spray-Applied Polyurethane Foam Thermal Insulation

Dear Sir/Madam:

I am writing this on behalf of the Spray Polyurethane Foam Alliance (SPFA), a 501c6 trade association representing contractors, distributors, manufacturers and raw material suppliers in the value chain of the spray polyurethane foam (SPF) insulation and roofing industry. For several years, members of the SPF industry have been working with the CEC in order that the products our industry offers receive fair and balanced treatment within the spirit, letter and administration of the building code.

At issue is the misrepresentation of the R-values of SPF's under Title 24 as defined in the *2008 Residential Compliance Manual* and the *2008 Reference Appendices*. Specifically, CEC treats all spray polyurethane foams as either **closed-cell** or **open-cell**. Furthermore, under Title 24, CEC assigns per-inch R-values to closed-cell SPF of 5.8 and open-cell SPF of 3.6.

However, all SPF insulations (as well as other insulation types) sold within the State of California must be licensed through the Department of Consumer Affairs's Bureau of Home Furnishings and Thermal Insulation.¹ One of the requirements for licensing is the disclosure of SPF insulation thermal performance (R-value).²

SPF insulations are unlike traditional fibrous insulations in that the R-values of the various insulations are dependent upon formulation rather than density. As such, the SPF insulations listed in the Bureau's *Directory of Certified Insulation Materials* vary from approximately 3.6 to 7.0, depending on type and formulation. The point being that the R-values of SPF insulation materials vary from product to product.

While the CEC requires that SPF insulation be licensed and certified for use in the state, CEC is not recognizing the R-values which the Bureau certifies.

The SPFA hereby requests changes in the 2013 Building Energy Efficiency Standards to:

1. Eliminate the current distinction between open-cell and closed-cell SPF;

2. Recognize the certified R-values of SPF insulating materials within the Standards; Reference, Joint and other appendices; and residential and nonresidential alternative calculation methods as appropriate.

Respectfully submitted,



Deer Ridge Consulting, Inc.
Roger V. Morrison, PE, RRC
President
(For the Spray Polyurethane Foam Alliance)

1. *2008 Building Energy Efficiency Standards for Residential and Nonresidential Buildings*, Section 118–Mandatory Requirements for Insulation and Roofing Materials.
2. *2007 California Referenced Standards Code*, California Code of Regulations, Title 24, Part 12, Chapter 12-13–Standard for Insulating Materials.