

**DOCKETED**

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<b>Project Title:</b>	Exceptional Compliance Method – BamCore Prime Wall
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*Comment Received From: Build Smart Group  
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**Dual Panel Hollow Wall will help CA meet its Climate Goals**

*Additional submitted attachment is included below.*



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California Energy Commission  
BSTD-11 Docket  
Exceptional Compliance Method - BamCore

To Whom It May Concern:

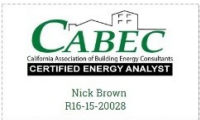
As an energy consultant, I am always looking for new ways to bring down the energy load of buildings I work on. I have admired the BamCore system for several years now, since visiting their booth at the Pacific Coast Builders Conference and Greenbuild. I believe this “Dual Panel Hollow” wall system has an important role to play in helping California meet its Greenhouse Gas emission reduction goals.

The Dual Panel Hollow (DPH) wall system greatly reduces the heat transfer in/out of the building by reducing the framing factor from ~25% for a typical wood-framed residential wall to ~7%, as demonstrated in the application filed by BamCore. But the real compelling part of it is that the wall thickness can be increased with no additional framing materials needed from 6” to 8” or 10”. Only additional insulation needs to be blown into the wall cavity – a nominal extra cost for much improved thermal performance. A conventional framed wall would require significant additional lumber to accomplish the same goal, which drives up cost and embodied carbon.

The DPH wall is done without the added complexity of rigid foam board being hung on the exterior of the framing with cladding built over it. As a former stucco industry member for 15 years, I know well the challenge that plastering over rigid foam presents to the contractors. This is why, despite making continuous insulation wall assemblies prescriptive standard since 2013, these high performance wall systems using rigid foam have not become standard practice in the homebuilding industry – they cost more than their compliance impact is worth in many climate zones, relative to other options available to the builders.

I write to the Commission to express my intent to utilize the DPH wall system in my practice as an energy consultant where my clients can benefit from an improved thermal envelope. The application appears to be well thought out and I recommend approval so that we can begin specifying these wall systems in California.

Sincerely,



Nick Brown  
President