

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	232530
<b>Document Title:</b>	Steve Dubin Comments - Suggestions for acceptance of multiple evaluation services code compliance reports
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Dubin
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/25/2020 3:19:39 PM
<b>Docketed Date:</b>	3/25/2020

*Comment Received From: Steve Dubin*  
*Submitted On: 3/25/2020*  
*Docket Number: 19-BSTD-03*

**Suggestions for acceptance of multiple evaluation services code compliance reports**

See attached letter regarding suggested code language regarding acceptable code compliance reports from accredited evaluation services

*Additional submitted attachment is included below.*



March 23, 2020

California Energy Commission  
1516 9<sup>th</sup> St.  
Sacramento, CA 95814

RE: Docket # 19-BSTD-03 California Title 24 Update Process

Rmax, a Sika Company, appreciates the opportunity to participate in, and comment on, the updating process for California Title 24. Rmax supports the CEC's continuous efforts to reduce unnecessary generated energy consumption used during building operations throughout the state.

This letter is in response to the letter posted to the docket on March 20, 2020 by the American Chemistry Council/ Spray Foam Coalition. While we do not have a comment specifically to the language pertaining to technical information about spray foam itself, we do agree with the need to eliminate language within the code that relies heavily on, or references, a single code evaluation service. The code has multiple references to material being tested in accordance with ICC Evaluation Services (ICC-ES) as single entity without room for equivalent evaluation services. While ICC-ES is a quality provider, other ANSI accredited evaluation services have been issuing equivalent code compliance reports and for many years, such as; DrJ, IAPMO, Intertek, ATI, CCMC, etc... Additionally, listing only one provider of evaluation services would inadvertently cut out competition. This would at the very least cause conflict on state and federal projects that require multiple building material manufacturers be listed in the project specifications.

Rmax suggests including language that points to the need of using materials whose properties are tested and approved according to a current code compliance reports (CCR) developed by an ANSI accredited evaluation service.

Rmax supports the continuing advancement of building efficiencies through the code and standards development process and will continue to work with the CEC to aid in that effort.

Regards,

**Steve Dubin, CSI**  
Architectural Development Manager  
**Rmax A Sika Company**  
C. 707-392-7269  
[dubin.steve@us.sika.com](mailto:dubin.steve@us.sika.com)  
[www.rmax.com](http://www.rmax.com)