DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235491
Document Title:	American Chemistry Council Comments - American Chemistry Council Comments
Description:	N/A
Filer:	System
Organization:	American Chemistry Council
Submitter Role:	Public
Submission Date:	11/3/2020 10:24:12 AM
Docketed Date:	11/3/2020

Comment Received From: American Chemistry Council
Submitted On: 11/3/2020
Docket Number: 19-BSTD-03

American Chemistry Council Comments

Please see the attached comments.

Additional submitted attachment is included below.

November 3, 2020

To: California Statewide Codes and Standards Enhancement (CASE) Program

From: American Chemistry Council (ACC)

Submitted Electronically to Docket 19-BSTD-03.

RE: 2022 Energy Code Pre-Rulemaking - Proposed 2022 Energy Code Nonresidential High-Performance Envelope

Thank you for the opportunity to comment on the proposed code change for reduced air infiltration to California's Title 24 Part 6 requirements. The American Chemistry Council (ACC) supports increasing energy efficiency of buildings during reroofing projects. The proposed changes for roof alterations will improve energy efficiency of nonresidential buildings in California.

ACC is an Important Stakeholder

ACC represents more than 170 leading companies engaged in the business of chemistry. The chemical industry employs approximately 544,000 people in the U.S. and provides nearly 33,000 direct jobs in California, generating approximately $511 million in state and local taxes.

ACC has extensive knowledge regarding building code development. Through ACC's Foam Sheathing Committee, Center for the Polyurethanes Industry and Spray Foam Coalition, North American Modern Building Alliance, and Plastics Division, we've partnered in recent building science research, including projects with Home Innovation Research Labs and the U.S. Department of Energy. ACC representatives serve on the ICC, ASHRAE, ASTM, AAMA, and other code and standard setting bodies.

The chemical industry supplies many products and materials to the building and construction value chain, including those that deliver energy efficiency throughout the entire structure. ACC members are also large users of energy, so the responsible use of energy is important to the industry's economic health and competitiveness. Energy efficiency is the lowest cost option for meeting energy demand. Energy efficient buildings create economic opportunities for businesses and industry by promoting new energy efficient technologies and reducing energy waste.

ACC Supports the Proposed Changes for Roof Alterations

ACC supports measures to increase insulation levels and air sealing, particularly adding continuous insulation, during reroofing projects. Increasing the energy efficiency of buildings is cost-effective and has positive impacts, in all climate zones, on:

- Carbon and other emissions,
- Energy conservation,
- Reducing peak energy demand,
- Occupant comfort, and
- Owner satisfaction.

Energy efficiency also benefits the local economy by providing high quality, well paid jobs in construction manufacturing and other industries.

We encourage CEC to prioritize enforcement of any new provisions for reroofing requirements. Members of ACC's Spray Foam Coalition often report that existing provisions for reroofing are often not enforce effectively.

If you have any questions or need additional information, please contact me at Stephen_wieroniey@americanchemistry.com, or (202) 249-6617.

Sincerely,

Stephen Wieroniey
Director