

**DOCKETED**

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*Comment Received From: Robert Raymer  
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**CBIA Comment on Ducts in Conditioned Space**

*Additional submitted attachment is included below.*



1215 K Street, Suite 1200  
Sacramento, CA 95814  
(916) 443-7933  
fax (916) 443-1960  
www.cbiam.org

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June 30, 2021

Commissioner Andrew McAllister  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: Timing of Requirements for Air Handler and Ducts in Conditioned Space

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,100 member-companies involved in residential and light commercial construction. CBIA member-companies are responsible for over 85% of the new homes built in California each year.

This letter expresses concern over the timing of requiring ducts and air handlers in conditioned space.

CBIA applauds the CEC for allowing ducts in conditioned space without insulation. There are promising technologies adopted by production builders in other states that move ducts into conditioned space. The current 45-day language allows an Exception for the proposed R4 below deck insulation, if all ducts and the air handler are placed in conditioned space. However, the requirement for ducts and air handlers in conditioned space is of concern because less than 1% of the production builder market installs the air handler in conditioned space. Most air handlers are installed in the attic which the industry realizes is not the best for energy efficiency.

For the 2022 Standards, a more gradual approach that places the supply ducts in the conditioned space while the air handler remains in the attic will encourage the market to install ducts in conditioned space and allow the market to make a transition to ducts and air handlers in conditioned space in the future. A gradual transition based on this approach and possible cost savings will move the market over the next code cycle. Assuming the HVAC equipment has a significant market share (> 20%) CBIA would support the requirement for ducts in conditioned space to require the air handlers to also be in the conditioned space.

CBIA urges the CEC to adopt 15-Day language that allows uninsulated ducts in conditioned space with air handler in the attic as an off-ramp for the proposed R4 below deck insulation for the 2022 cycle of Standards.

Sincerely,

Robert E. Raymer, PE  
Senior Engineer