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August 4, 2021

Mr. J. Andrew McAllister, Ph.D.
Commission
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: SUPPORT OF 2022 ENERGY CODE UPDATE RULEMAKING—Docket 21-BSTD-01 2022 Energy Code Update Rulemaking

Knauf Insulation is a global manufacturer of high performing glass mineral wool insulation materials for building envelopes, acoustic control, mechanical air delivery, pipe systems and OEM and industrial applications. Our company is a market leader in environmental and sustainability innovations affecting insulation materials and our insulation products are highly valued by designers and engineers for their quality and breadth of offerings.

Knauf Insulation supports the proposed energy code changes and revisions represented in the 15-Day Express Terms 2022 Energy—Residential and Nonresidential (Docket 210-BSTD-01) and we are hopeful that the Energy Commission will provide technical support, compliance manuals and training in a timely manner to support these energy code changes upon their effective date.

While these changes affect a wide range of individual building performance targets, their primary focus has been on moving closer to “electric ready” buildings, and breaking out of multifamily specific building requirements from those of single family and nonresidential buildings to their own separate multifamily chapters within Title 24, Part 6. We support these energy code revisions.

Going forward, for these changes and future energy code updates Knauf Insulation will continue to provide insulation materials that support the state’s energy code for all building segments—single family, multifamily, and nonresidential. However, it should be noted that the Energy Commission’s continued allowance of trading-off energy features dilutes the purpose of envelope efficiency improvements and steals energy savings and comfort from occupants.

Example: Energy Commission staff found in the energy code updates of 2016 and 2019 that improvements to the insulation levels in both attics and walls saved energy and were cost effective, helping to reduce the first costs of future PV systems for homes. Knauf Insulation responded to the residential changes for the 2019 energy code by developing and offering a high performance roof/attic product--ECOBATT® Integrated Roof Deck (IRD) insulation. Offered in both R19 and R38, this new product is specifically targeted to meet prescriptive residential compliance and help provide additional energy savings and compliance credit depending on R-value installed.

However, today’s market penetration of high performance attics [and walls] is nearly non-existent



in the state due to the allowance for trading off energy features, particularly for high efficiency space and water conditioning appliances. Consultant work supporting the Energy Commission's standards development process noted the important role envelope energy efficiency has in reducing peak demand for building energy use. Similar recognition is noted by the Department of Energy's *National Roadmap for Grid-Interactive Efficient Buildings (May 2021)*.

Removing the inequity created by unfair energy compliance trade-offs—setting specific efficiency target levels for envelope, space and water conditioning, and solar electric, will help insure efficiency choices made during the design and construction process will be realized for the building structure for years to come.

Knauf Insulation supports the revisions being proposed for the state's 2022 Energy Code Update and looks forward to continuing our commitment to help designers and builders meet the efficiency requirements by providing a high quality insulation products for a wide range of building applications.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David W. Ware". The signature is fluid and cursive, with a long horizontal stroke at the end.

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