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Comment Received From: Polyisocyanurate Insulation Manufacturers Association (PIMA)

Submitted On: 5/13/2024

Docket Number: 24-BSTD-01

PIMA Comment Regarding Proposed 2025 Building Energy Efficiency Standards

Additional submitted attachment is included below.

Sent via [Electronic Commenting System](#)

May 13, 2024

California Energy Commission
Docket Unit
Attention: Docket No. 24-BSTD-01
715 P Street, MS-4
Sacramento, CA 95814

Re: California Proposed 2025 Building Energy Efficiency Standards, Docket No. 24-BSTD-01

Dear Energy Commission,

Thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2025 Building Energy Efficiency Standards that were released for public comment on March 29, 2024. The Polyisocyanurate Insulation Manufacturers Association (PIMA) is encouraged by the small increases in envelope stringency. Although these are certainly welcomed changes, the proposed increases in stringency for nonresidential "wood framed and other" roof category envelope requirements are overdue and are still below the requirements under current versions of the IECC and ASHRAE 90.1 Standard. Ultimately, PIMA encourages the CEC to move the State's requirements for building envelope insulation to be more in line with (or exceed) the values required under the 2021 IECC and ASHRAE 90.1-2022 Standard.

Better, more efficient envelopes have multiple benefits, some of which may not be captured by the current energy code.

Energy Efficiency: As with all energy efficiency measures, better envelopes reduce energy use and costs; reduce the potential burden on the electric grid during the transition to electrification; and make it more likely that buildings will be able to achieve net-zero status with onsite renewable energy and smart, flexible technologies.

Resiliency: Better envelopes directly improve resiliency and passive survivability.

On-Site Emissions: According to the 2018 CBECS ([Table E7](#)), 69% of on-site natural gas use is for space heating, which is disproportionately impacted by the envelope.

Multiplier Effect: Better envelopes facilitate the use of smaller, less expensive, and more efficient heating and cooling equipment, so the ultimate gain in efficiency and improvement in cost-effectiveness is greater than it would be for the envelope measure alone. The inverse is also true, that low performing envelopes limit equipment options and opportunities to improve efficiency in the future without expensive retrofits.

Dependability: Unlike other types of equipment, which are prone to malfunction and, therefore, not achieving the anticipated and reliable energy savings, envelopes are essentially permanent features that continue working as intended throughout the life of a building.

Information about the Polyisocyanurate Insulation Manufacturers Association

PIMA is the trade association for North American manufacturers of rigid polyiso foam insulation – a product that is used in most low-slope commercial roofs as well as in commercial and residential walls. Polyiso insulation products and the raw materials used to manufacture polyiso are produced in over 50 manufacturing facilities across North America.

Thank you for the opportunity to submit these comments. Please contact me should additional information be necessary (jkoscher@pima.org; (703) 224-2289).

Sincerely,



Justin Koscher
President