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*Comment Received From: North American Insulation Manufacturers Association
Submitted On: 5/20/2024
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NAIMA comments on IBE and CBIA comments - Title 24

See attachment

Additional submitted attachment is included below.



VIA E-COMMENT

May 20, 2024

J. Andrew McAllister, Ph.D.
Commissioner
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: 2025 Building Energy Efficiency Standards, Title 24, Parts 1 and 6, Express Terms, 45-Day Language (Docket Number: 24-BSTD-01); The North American Insulation Manufacturers Association's ("NAIMA") Comments on the Institute for the Building Envelope ("IBE") and the California Building Industry Association's ("CBIA") Comments Submitted May 13, 2024

Dear Commissioner McAllister:

The North American Insulation Manufacturers Association ("NAIMA") is the trade association for manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation using fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials. Three of NAIMA's member companies operate production facilities in California.

The recent comments submitted by the Institute for the Building Envelope ("IBE") and the California Building Industry Association ("CBIA") dated May 13, 2024, seek to needlessly amend California's 2025 Building Efficiency Standards, Title 24, Parts 1 and 6, Express Terms, 45-Day Language. NAIMA strongly recommends that the California Energy Commission ("CEC") reject these amendments.

The changes to Title 24 suggested by the IBE and CBIA give preferential treatment to a particular product. NAIMA recognizes that R-value and air sealing are important, but all products should be held to the same R-value and air sealing requirements. Prescriptive solutions to reductions in R-value for a particular product do not necessarily save energy, and those solutions should be modeled rather than allowed prescriptively. Air-impermeable spray foam insulation should not be given preferential treatment, and the proposed changes recommended by the IBE and CBIA do just that. **Multiple compliance paths are already available; the changes and allowances suggested in the comments are not necessary.** The existing California Performance Method is the proper place to model and show compliance for the unvented attic assembly. Modeling of the ceiling assembly proposed by the IBE and CBIA will ensure net code compliance and energy savings as intended. **It is unnecessary and inappropriate to carve out a specific allowance and allow reduced R-values prescriptively for a particular product.**

J. Andrew McAllister, Ph.D.

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For the above stated reasons, NAIMA requests that the CEC reject the proposed modifications. NAIMA welcomes the opportunity to meet with you to discuss the issues outlined above. Thank you for your consideration of these comments.

Sincerely,

Jason Vandever
Director of Technical Services, NAIMA