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IBE Comments Response_OC

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Additional submitted attachment is included below.



May 21, 2024

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

RE: 2025 Title 24, Part 6, Energy Code Rulemaking – 45-Day Language
Response to Institute for the Building Envelope Comments - Comments from the Institute for the Building Envelope - TN# 256344

Commissioners:

Owens Corning is a leader in the Building Materials market, and a manufacturer of various forms of fiberglass, mineral wool and spray polyurethane insulation products. Owens Corning and our customer base maintain a significant level of market knowledge around building codes and their impact on the builder community. We continue to remain engaged in the code development process and for this cycle we have been pleased to see some movement to enhance the overall efficiency, durability and resiliency of California's housing stock, while also maintaining options for compliance.

Most building and energy codes, including California's energy code, offer various paths to compliance. The Prescriptive Path, in our opinion, is meant to be a simplified process for code compliance.

With respect to this view of the Prescriptive Path, we offer the following responses to the recent comments (as noted above) by the *Institute for the Building Envelope*:

1. Creating Prescriptive Unvented (Sealed) Attic Design:
 - a. We argue that there is no need or benefit in providing for another Prescriptive Attic design.
 - b. The proposed new attic design can already be done via the Performance Path approach, and,
 - c. The Performance Path approach is the appropriate path for such an assembly because this allows for the energy modeling software to appropriately measure the potential compliance losses or gains, based on the specific set of measures deployed.
 - d. Furthermore, stipulating a Prescriptive Attic Design that is dependent on additional measures or variables is making the assumption that such measures will perform equally in a multitude of known and unknown build scenarios.
2. Updating the Definition of Conditioned Space, Indirectly:
 - a. With reference to SB-837, the Bill states as follows: "Beginning with the triennial review of Part 6 (commencing with Section 100.0) of Title 24 of the California Code of Regulations that is pending as of January 1, 2024, **the commission shall consider** revising the definition of "conditioned space, indirectly" for purposes of those regulations to include sealed and unvented attics, where the space is enclosed by the primary thermal and air barrier and directly adjoining conditioned space."
 - i. Notice the bolded text above wherein the Bill only requires that the Commission consider the topic.
 - ii. Without knowing the specifics of how the Commission may have already "considered" this topic, it is our opinion that changing the definition of *conditioned space* would require a very deep technical review, which should also consider other non-directly conditioned spaces where HVAC distribution ducts

are also located, including but not limited to: interstitial building chases, interstitial spaces between floors, chases abutting exterior walls, as well as existing unvented attic assumptions around actual heat losses, etc.

iii. Should the Commission wish to explore this topic, we would be interested in participating, and to the extent possible, share our technical knowledge and findings on the subject.

3. Updating the CBECC-Res 2025 User Manual:

a. This is tied to Item #2 above and should only be addressed based on a comprehensive review surrounding the technical merits of such a language change.

We would like to take this opportunity to remind the Commission and our industry peers that our expressed positions do not come from a competitive perspective. We offer a full range of insulation products among other building materials, and therefore are not viewing this as a product specific conversation. In our view this is about code policy, process and technical merit guiding code language changes. To that end, the Legislature properly left the final decision to the Commission, and inferred this to be part of the normal regulatory and technical review process, wherein subject matter experts could weigh in.

Owens Corning recognizes the delicate balance and market realities our customers and their customers must deal with when it comes to code compliance and housing affordability. Maintaining flexibility in building and energy codes, where appropriate, is a critical component to maintaining a healthy and sustainable housing and construction industry.

Regards,

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