

**DOCKETED**

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## **2025 CEC Rulemaking - IBE Comment Response**

*Additional submitted attachment is included below.*

May 21, 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); Comments by Johns Manville regarding comments made by the Institute for the Building Envelope (IBE) and the California Building Industry Association (CBIA) dated May 13, 2024

Dear Commissioner McAllister,

Johns Manville (JM) manufactures premium-quality insulation, commercial roofing and fibers and nonwovens for commercial, industrial and residential applications, as well as operating a fiberglass insulation manufacturing facility in California. As part of our leadership in the construction industry, JM is engaged in the development and adoption of codes and standards throughout the U.S. and Canada, including California. We support and are encouraged by the updates to California's 2025 Building Efficiency Standards.

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

California, through the Codes and Standards Enhancement (CASE) process, has a robust and well-established mechanism for evaluating code change proposals. The CASE process engages multiple stakeholders, subject matter experts, and the public to objectively evaluate code change proposals against California's regulatory and legislative goals, as well as for cost-effectiveness and practicality to implement in homes and commercial buildings. The CASE process carefully validates proposals and seeks to mitigate or at least identify unintended consequences. The suggested changes would effectively short-circuit the CASE process, incorporating a new Prescriptive option that has not been properly evaluated for the California market.

The Performance Path is the appropriate path for unvented attics in residential buildings. The Performance Path allows the use of any appropriate insulation material, and energy modeling software determines the energy compliance losses or gains, based on all of the energy-saving measures specified. Allowing a Prescriptive High Performance Attic that requires additional measures (such as air-tightness that is beyond code standard), assumes that these measures will perform equally in all housing types and climate zones, which is not necessarily the case.

The suggested changes to Title 24 proposed by the Institute for the Building Envelope give preferred consideration to one product category. Johns Manville agrees that both air-sealing and insulation R-values are important to an efficient, comfortable, and safe home. We also feel that all products should be held to the same standard of performance. We are concerned that allowing product-specific carve-outs to work their way into building codes and standards will erode the legitimacy of codes and ultimate energy efficiency goals in the eyes of the industry and the public. Building codes and standards are for the benefit and safety of the public and should not look like a collection of benefits for specific industries or special interests.

JM would like to emphasize that our comments and positions do not come from a competitive perspective. We offer a broad range of insulation products, including fiberglass, mineral wool, spray polyurethane foam, and polyisocyanurate foam sheathing. Our perspective is related to maintaining strong and enforceable codes, that are developed through a robust process that helps balance the goals of California and the need for affordable homes.

For the above stated reasons, Johns Manville requests that the CEC not accept the proposed modifications. Johns Manville welcomes the opportunity to meet to discuss the issues outlined above. Thank you for your consideration of these comments.

Sincerely,



Francis (JR) Babineau, P.E. (CO)  
Sr. Research Manager, Building Science  
Johns Manville Corporate R&D