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*Comment Received From: Institute for the Building Envelope and CBIA
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IBE and CBIA Comments Part 2 2025 Energy Code Rulemaking

Additional submitted attachment is included below.



June 4, 2024

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

Submitted Electronically

RE: 2025 Building Energy Efficiency Standards, Title 24 Parts 1 and 6, Express Terms, 45-day Language (Docket Number: 24-BSTD-01)

Dear Commissioner McAllister,

Thank you for taking the time to meet to discuss unvented attics, SB 837, and the 2025 update to Title 24; Part 6. After our meeting, we reviewed comments submitted by members of the fiberglass industry. There are several statements in these letters that I would like to respond to for informational purposes:

- The unvented attic assembly is not specific to spray foam. In fact, the North American Insulation Manufacturers Association (NAIMA) developed a code change proposal for unvented attics which was [adopted](#) into the 2018 International Residential Code. NAIMA released a [compliance document](#) on the fiberglass unvented attic assembly. [Owens Corning](#) and [Johns Manville](#) each have installation guidelines for the fiberglass unvented attic assembly.
 - This is why the joint IBE and CBIA letter does not mention a single insulation product.
 - We believe Title 24 Part 6 should allow the use of any insulation & air sealing solutions in unvented attics, provided the assembly meets the performance requirements.
- Comments from the fiberglass industry focus on favorable treatment for one insulation product. We are not asking for favorable treatment for spray foam insulation. Our proposal is focused on performance of the unvented attic assembly.
 - The assembly proposed by IBE and CBIA is material agnostic; provided the insulation is R-30 and the home meets 3.0 ACH₅₀.
- The concept that the California Performance method is the proper place to demonstrate compliance for unvented attics creates a situation that favors the current high performance attic designs. The fiberglass industry is singling out the unvented attic assembly to not be given the same recognition as other approved assemblies in the prescriptive tables.

- The IBE and CBIA proposal is attempting to level the playing field for vented and unvented attics. We do not think either assembly deserves special treatment inside the Code.
- Owens Corning suggests that unvented attics are “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.”
 - Title 24; Part 6 currently spells out measures for providing proper air sealing of a home and prescriptive levels of insulation required in the Roof/Ceiling. The unvented attic assembly is not introducing any new variables the Code.
 - Builders are constructing unvented attics in California every day. The idea that unvented attics are not performing is anecdotal and does not reflect building science.
 - All unvented attics will need to comply with the Code requirements for unvented attics in the California Residential Building Code.
- Comments from the fiberglass industry oppose changes to the definition of “Conditioned Space, Indirectly.” We believe unvented attics meet the definition in the 2022 Standard. If CEC agrees, further changes to the definition are not necessary.

Sincerely,

The Institute for the Building Envelope
The California Building Industry Association