

DOCKETED

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BASF 2016 Residential Compliance Letter

Dear California Energy Commission,

Attached please find our letter of comments on the Draft 2016 Building Energy Efficiency Standards Residential Compliance Manual.

We look forward to working with you to encourage and facilitate compliance with California's advanced energy codes.

Additional submitted attachment is included below.



We create chemistry

150 years

July 31, 2015
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**RE: Docket No. 15-BSTD-02
2016 Residential Compliance Manual and Compliance Documents**

Dear Energy Commission Staff,

BASF's Center for Building Excellence (CBE) is dedicated to making today's homes more comfortable, safer, healthier, more durable and more efficient than ever before. The team of experts at CBE continually work to identify and refine materials and systems that that deliver this holistic performance. In particular, we focus on the development of high-performance envelope systems, including several approaches that offset costs through innovative cost-shifting strategies.

We are pleased to see that the Commission has also chosen to focus on envelope measures in the 2016 Standards as a crucial step towards reaching the State's Zero Net Energy (ZNE) goals. Additionally, we appreciate the focus on flexible performance targets such as the $U=0.051$ prescriptive requirement for High Performance Walls in most California Climate Zones, which allows builders considerable freedom with respect to designing and selecting materials for wall assemblies.

However, we are concerned that certain sections within the 2016 Draft Residential Compliance Manual may lead users to conclude that the Standards are in fact less flexible than the letter of the code would indicate. For example, the section addressing Advanced Wall Systems suggests that builders must "use a minimum 2x6 at 24" on-center wall framing". Although this is one effective means of improving insulation value while maintaining structural integrity, the BASF HP+ system can meet or exceed the prescriptive $U=0.051$ value through the use of 2x4 at 24" on-center framing, while at the same time improving the structural integrity of the wall assembly.

There are a number of other instances throughout the manual where the selective use of closed cell Spray Polyurethane Foam, as well as other products offered by BASF, can provide some of the most cost-effective means of creating the improved thermal, structural, and moisture-resistant roof and wall assemblies envisioned by the 2016 Standards. The Center for Building Excellence looks forward to working with Energy Commission Staff to provide additional assembly examples, diagrams and specifications for inclusion in the 2016 Residential Compliance Manual. We believe that presenting numerous compliance alternatives is a critical step to encourage adoption of high performance walls and attics, and toward meeting the State's objectives for ZNE residential new construction by 2020.

Sincerely,

BASF Center for Building Excellence