

## DOCKETED

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*Comment Received From: Charles Cottrell*

*Submitted On: 8/20/2015*

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**NAIMA Comments on 15-BSTD-04 ACM Reference Manuals**

*Additional submitted attachment is included below.*



Sent via email to [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

August 20, 2015

Commissioner McAllister  
California Energy Commission  
Attention: Docket No. 15-BSTD-04  
Dockets Office 1516 Ninth Street, MS-4  
Sacramento CA 95814

Subject: Comments from the NAIMA on Docket Number 15-BSTD-04 Residential and Nonresidential Software and Related ACM Reference Manuals

Commissioner McAllister:

These comments are submitted on behalf of the North American Insulation Manufacturers Association regarding the proposed changes to the Residential and Nonresidential Software and Related ACM Reference Manuals. NAIMA is the association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation through the use of fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials.

NAIMA strongly urges the California Energy Commission to take the following actions regarding the proposed revisions to the manual regarding the “photovoltaic compliance credit” (PVCC):

1. Reduce the size of the proposed PVCC. The proposed credit would allow the elimination of the new high performance attic and wall (HPA and HPW) requirements. These are the most energy efficient requirements added to the 2016 Title 24. The proposed trade-off should only permit either the HPA or HPW requirements to be “traded-off” – not both.
2. Sunset the PVCC. The stated purpose of the PVCC is to allow builders time to learn new building methods necessary to meet the HPA and HPW requirements. There are building methods and materials available today to meet the HPA and HPW requirements. Having an expiration date will provide builders a target date to work any changes necessary to meet the HPA and HPW techniques into their building practices and schedules. The proposed trade-off should sunset on January 1, 2018.
3. Require training to claim the PVCC. Assuming the premise that building HPAs and HPWs are new or innovative building practices and the PVCC is necessary to transition builder to those practices – it naturally follows that only builders who have completed training on HPA and HPW techniques be able to use the PVCC.

4. Limit availability of the PVCC. The PVCC should only be available to builders that aren't currently able to build HPAs and HPWs. Allowing builders who are already employing these practices is essentially "free ridership." This will allow homes that would otherwise have HPAs and HPWs be built less efficiently simply by taking advantage of the PVCC. The PVCC should only be available to builders that require training to meet the new HPA and HPW requirements.
5. Require documentation when in order to claim the PVCC. The PVCC is intended to give builders that aren't currently able to build HPAs and HPWs time to learn and implement these practices. Requiring documentation will incentivize builders to implement these practices in a timelier manner. In order to use the PVCC the builder should be required to submit documentation verifying the need to use the credit.

NAIMA is strongly opposed to any provisions that allow or encourage the reduction of permanent energy efficiency measures, like attic, ceiling and wall insulation and windows, to be reduced or eliminated using renewable energy measures. The suggested modification above would help mitigate some of those concerns.

Thank you for your consideration of these comments. Please contact me if you have any questions regarding these comments.

Sincerely,

Curt Rich  
President and CEO