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Comment Received From: Shawn Mullins

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Text of Oral Comments at 2019 Draft Language Workshop - Owens Corning

Additional submitted attachment is included below.



October 5, 2017

California Energy Commission

RE: Text of Oral Comments at 2019 Draft Language Workshop

We would like to begin by thanking Commissioner McAllister and Commission staff for their efforts thus far in the development and transparency related to the 2019 Standards. Owens Corning acknowledges that there are a variety of perspectives regarding the Standards and we continue to advocate for continued dialogue during this process.

In regards to what has been proposed to date, Owens Corning supports existing CEC staff recommendations, including:

- Prescriptive language with enhanced assembly U-factors for attics and walls
- Quality Insulation Installation (QII) as a prescriptive measure
- The Energy Design Rating (EDR) path as currently proposed

Owens Corning has extensive knowledge in applied Building Science and it is from this perspective that we continue to promote policies and practices that look at buildings from a systems perspective. Given this perspective, we believe that energy efficiency, renewables (solar, wind) and power storage are inherently complimentary when appropriately balanced. When this balance is skewed, we risk scenarios wherein we over-promise and under-deliver in regards to energy policy, electrical grid management and consumer's long-term benefits. We believe there are case examples to support this concern.

In the coming weeks, we expect to submit additional written comments which will further detail the science and economics behind our reasoning that energy policy should start with a foundation of optimized energy efficiency which is then supplemented by renewables, storage and other technologies.

Owens Corning has teams across the country that work every day with various stakeholders, including the builder community to deliver on this optimization promise. We work collaboratively with various industry suppliers from a wide spectrum of categories. We are sensitive to builders' first-cost concerns and look forward to demonstrating that the right recipe of energy efficiency, renewables and other technologies can strengthen a builder's business without sacrificing on sound energy policy. We continue to be open to direct dialogue with other stakeholders involved in this process for the purpose of finding common ground.

Thank you for the opportunity to be represented today.

Regards,

Shawn P. Mullins

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