

## DOCKETED

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<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222446
<b>Document Title:</b>	National Ready Mixed Concrete Association Comments on the Title 24, Part 6 Standards 45-day Language
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*Comment Received From: Tien*

*Submitted On: 2/5/2018*

*Docket Number: 17-BSTD-02*

**National Ready Mixed Concrete Association Comments on the Title 24, Part 6  
Standards 45-day Language**

*Additional submitted attachment is included below.*



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**National Ready Mixed Concrete Association Comments on the Title 24, Part 6 Standards 45-day Language**

February, 4, 2018

California Energy Commission  
Title 24 Building Energy Efficiency Standards:  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

RE: Docket #17-BSTD-02

The National Ready Mixed Concrete Association (NRMCA) is the leading industry advocate for representing and serving the entire ready mixed concrete industry. NRMCA has been a participant in the development of the 2019 Standards and supports their adoption. NRMCA appreciates the opportunity to provide input on the 2019 Standards Rulemaking.

NRMCA would like to request that the thermal properties of insulating concrete forms in Joint Appendix JA4 Table 4.3.13 be updated from the current values to updated values that reflect current product values. The Expanded Polystyrene (EPS) foam insulation used in Insulated Concrete Forms (ICF) has improved in thermal performance since the table was last updated. NRMCA has provided updated u-factor values for Table 4.3.13 to the California Energy Commission (CEC) which reflect current market products in the industry. NRMCA has noticed that the change in thermal performance has not been implemented in the 45-Day Language and requests that Table 4.3.13 be updated with the current industry values that have been provided to the CEC in the 15-Day Language. The update to the thermal performance values is not a substantive change and will provide updated and accurate thermal properties for ICF's.

Thank you for the opportunity to participate in the 2019 Standards Rulemaking and for the consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Tien Peng". The signature is written in a cursive, flowing style.

Tien Peng  
Vice President of Sustainability, Codes and Standards, NRMCA  
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