

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222869
<b>Document Title:</b>	American Chemistry Council Comments CPI Comment; Duct Leakage Testing
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*Comment Received From: Michael D. Fischer*

*Submitted On: 3/5/2018*

*Docket Number: 17-BSTD-02*

## **CPI Comment; Duct Leakage Testing**

Please see attached letter.

*Additional submitted attachment is included below.*



March 5, 2018

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

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento CA 95814-5512  
Attn: Payam Bozorgchami

**RE: Docket No 17-BSTD-02 - 2019 California Title 24 Update Process**

Dear Mr. Bozorgchami,

The American Chemistry Council's Spray Foam Coalition<sup>1</sup> (SFC) is pleased to provide the following comments regarding the discussion and outcomes of the California Energy Commission's (Commission) 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking and February 5<sup>th</sup> and 6<sup>th</sup> hearing on the 2019 Title 24 update process. The SFC champions the use of spray polyurethane foam in North America by promoting its energy efficiency, performance, economic benefits, and contributions to sustainability. The SFC provides a forum to conduct research, to advocate for science-based public policy, excellence in safety, stewardship, training, and to advance technical knowledge. The SFC supports the advancement of building energy efficiency through the code and standards development process and looks forward to working with the Commission to update the state's building energy standards.

SFC requests that the following exception be added to the California Energy Code Title 24 Part 6 Residential provisions:

**Duct testing for air leakage is not required where the ducts and air handlers are located entirely within the building thermal envelope and air barrier.**

**Reason:**

The 2018 International Energy Conservation Code (IECC) includes the following provision as an exception to Section R403.3.3 that covers air leakage testing for ducts:

“A duct air-leakage test shall not be required where the ducts and air handlers are located entirely within the *building thermal envelope*.”

The IECC provision provides savings for homes built with ducts located within the thermal envelope. This exception recognizes that the need for duct testing in single family homes is based on typical ventilated attic construction with traditional duct installation in the attic. When ducts are located within a sealed attic, or at the ceiling level, but buried within the insulation (and thus within the thermal envelope), there is little benefit in terms of energy savings from the air leakage testing.

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<sup>1</sup> The SFC is composed of thirty companies that produce and sell polyurethane spray foam insulation systems and the chemicals and equipment necessary for their use.



As the CEC strives to promote the use of high-performance attic design in residential construction, applying this exception will provide builders with an added incentive to place the ducts in conditioned space. In order to ensure proper performance, the proposed provision includes the requirement that the ducts be located within the air barrier for the exception to apply.

Please feel free to contact me at [stephen\\_wieroniey@americanchemistry.com](mailto:stephen_wieroniey@americanchemistry.com) or 202-249-6617 with any questions.

Regards,

A handwritten signature in black ink, appearing to read "Stephen Wieroniey", with a long horizontal flourish extending to the right.

Stephen Wieroniey  
Director