

## DOCKETED

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| <b>Project Title:</b>   | 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking |
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*Comment Received From: David Mann*

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## **Foam Sheathing Committee Comments**

*Additional submitted attachment is included below.*



April 25, 2018

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Via Online Submission to Docket 17-BSTD-02

**Re:** Docket Number: 17-BSTD-02 (1/19/2018)  
2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

The Foam Sheathing Committee (FSC) of the American Chemistry Council (ACC) thanks the California Energy Commission for its leadership in promoting building energy efficiency. The FSC operates as part of the Plastics Division of the American Chemistry Council (“ACC”) with member companies: Atlas Roofing, Dow, GAF, Hunter Panels, Johns Manville, Kingspan Insulation, Owens Corning, and RMAX.

The FSC provided comments regarding the staff supplement on high performance attics (TN# 222275) on February 28, 2018 with multiple recommendations relating to insulation provisions.

The newly released 15-day language in TN# 223257-3 has taken a different, but we believe appropriate and useful, approach to these provisions. Specifically, the FSC strongly supports the inclusion of the additional language in footnote 2 to Table 150.1-B that notes “Alternatives including insulation above rafters or above roof deck shall comply with the performance standards.” We appreciate the consideration of the CEC staff and applaud them for their continued work to complete this important update to California’s Building Energy Efficiency Standards.

Sincerely,

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