

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	223317
Document Title:	Polyisocyanurate Insulation Manufacturers Association's Comments
Description:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
Filer:	System
Organization:	Polyisocyanurate Insulation Manufacturers Association/Justin Koscher
Submitter Role:	Public
Submission Date:	5/3/2018 1:59:39 PM
Docketed Date:	5/3/2018

Comment Received From: Justin Koscher

Submitted On: 5/3/2018

Docket Number: 17-BSTD-02

Polyisocyanurate Insulation Manufacturers Association Comments

Additional submitted attachment is included below.

Submitted via Electronic System

May 3, 2018

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

**Re: Docket No. 17-BSTD-02
2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking**

Dear Commissioners:

The Polyisocyanurate Insulation Manufacturers Association (PIMA) applauds the leadership efforts of the California Energy Commission (CEC) on building energy efficiency. PIMA represents manufacturers of laminated polyiso insulation board stock products. Polyiso insulation is the most widely used product for above-deck insulation in low-slope commercial roof systems and a growing percentage of other applications in residential and commercial construction.

PIMA supports the public comments filed by the Foam Sheathing Committee of the American Chemistry Council (dated February 28, 2018) regarding the staff supplement on high performance attics. We were encouraged to see their public comments reflected in the 15-day language (TN# 223257-3). In particular, PIMA supports the language included in Footnote 2 to both Table 150.1-A and Table 150.1-B that states, “Alternatives including insulation above rafters or above roof deck shall comply with the performance standards.” This language recognizes how above-deck roof insulation in residential and commercial construction has been used successfully for many decades.

Thank you for the opportunity to review and submit comments on the development of the 2019 Title 24 standards.

Sincerely,



Justin Koscher
President