

<b>DOCKETED</b>	
<b>Docket Number:</b>	18-BSTD-02
<b>Project Title:</b>	2019 ENERGY CODE COMPLIANCE MANUALS
<b>TN #:</b>	224392
<b>Document Title:</b>	CBIA Comments on 2019 Energy Code Compliance Manuals
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	CBIA/Megan Cordes
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/3/2018 11:37:18 AM
<b>Docketed Date:</b>	8/3/2018

*Comment Received From: Megan Cordes*  
*Submitted On: 8/3/2018*  
*Docket Number: 18-BSTD-02*

**CBIA Comments on 2019 Energy Code Compliance Manuals**

*Additional submitted attachment is included below.*



**August 3, 2018**

**To: California Energy Commission, Docket – 18-BSTD-02**

**Re: 2019 Energy Code Compliance Manual and Documents**

California Energy Commissioners and Staff,

The California Building Industry Association is a statewide trade association based in Sacramento representing thousands of member companies including homebuilders, trade contractors, architects, engineers, designers, suppliers and industry professionals in the homebuilding, multi-family and mixed-use development markets. CBIA appreciates the opportunity to provide feedback and input on the 2019 Title 24 Compliance Manuals.

CBIA recommends a more thorough explanation of each solar exception. For example, Exception 1 allows for a downsized system or no system at all if shading from adjacent buildings, trees, or other features reduces the area available for solar. Manual language should explain documentation requirements for this exception as well as a description of what tools should be used to determine “solar access.” Appendix C of the CEC’s Guidelines for California’s Solar Electric Incentive Programs (SB1) Six Edition has clear explanations of shading and solar access. Similarly, Exceptions 2 and 3 allow for reduced system sizes for two- and three-story homes that don’t have enough roof space. The manual language should provide examples of homes that would meet those exceptions along with an explanation of documentation and verification requirements. For all of the exceptions that reference “solar access,” the definition of solar access should be clearly laid out to facilitate appropriate compliance with these exceptions.

The Community Solar compliance option also needs more explanation. Because this option is very new to the California building industry, builders, code officials, and other members of the target audience for the Manuals will need a lot of guidance in the different ways to comply with this option. The Manual should also address any known market barriers for utilities, builders and local jurisdictions.

An issue that has previously been discussed, both with respect to Title 24 code language and compliance manual language, is the modeling of ducts in conditioned space. There remains a lot of confusion in the industry regarding how to model ducts in conditioned space with unvented attics, which are considered indirectly conditioned space. CBIA requests that CEC staff clarify indirectly and directly conditioned attics and how to model ducts in unvented attics in both the Residential Compliance Manual and the Residential ACM Reference Manual.

In Chapter 8-Performance Method, CEC staff should add alternative prescriptive packages to provide builders with options that include 2x4 walls while the industry continues to move toward 2x6 construction. For example, CBIA can provide an option that includes a “super-insulated” attic with high performance HVAC/water heating equipment as well as a prescriptive package modeled by ConSol that allows a builder to install an appropriate ratio of glazing regardless of the orientation of the home.



## California Building Industry Association

---

1215 K Street, Suite 1200 • Sacramento, CA 95814 • (916) 443-7933 • fax (916) 443-1960

Lastly, staff should add language to the compliance manual to help users correctly determine the nominal tonnage of an air conditioning unit for the purpose of determining the minimum airflow requirement.

For all of these recommendations, CBIA has or will provide appropriate language and/or technical documentation and will meet with staff to further clarify and resolve issues outlined here. As stated in previous comments to the docket, CBIA supports the 2019 Standards and looks forward to working with the CEC to ensure a smooth transition and implementation.

Thank you,

Megan Cordes

CBIA Lead Technical Consultant