

**DOCKETED**

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**Owens Corning Comments on 2022 Title 24, Part 6 Rulemaking, 15-day Express Terms\_7-27-21**

*Additional submitted attachment is included below.*



July 27, 2021

California Energy Commission  
Attention: Docket No. 21-BSTD-01  
Dockets Office 1516 Ninth Street, MS-4  
Sacramento CA 95814

RE: 2022 Title 24, Part 6 Rulemaking, 15-day Express Terms  
Building Energy Efficiency Standards (BEES)

To Commissioner McAllister and Commission Staff:

We would like to begin by thanking Commissioner McAllister and Commission Staff for their efforts thus far in the development and transparency related to the 2022 BEES. Owens Corning acknowledges that there are a variety of perspectives regarding the BEES and we can appreciate the very difficult job staff has in accommodating the various perspectives and opinions.

Owens Corning is a leader in fiberglass and related materials, systems and solutions. Our products are largely a result of our applied Building Science and Sustainability efforts which drive our innovation and our global operations. Owens Corning product specifications and operational activities are specifically undertaken with a measurable awareness towards natural resources stewardship as an integral part of our self-imposed sustainability journey. Thus, it is with long-term resource sustainability, durability, occupant comfort and energy efficiency, that we provide the following perspectives.

We support the Commission's efficiency and carbon reduction goals for residential homes and non-residential buildings. In doing so, it is critical that the Commission maintain the historical and well-established loading order of focusing on energy efficiency first, followed by renewables and associated technology. We believe energy efficiency, renewables and bolt-on technology, when applied in the proper balance are inherently complimentary. To achieve this complimentary equilibrium, the building envelope must be optimized to the maximum extent feasible. Only when viewed in this context and with proper weight given to sustainability concerns and thereby provide society and the industry with maximum value and performance. This is not an "either/or" conversation, but one of using optimized compliance paths to create an intelligent and predictable outcome in support of the Commission's stated goals.

With respect to the current 15-day language, we strongly encourage the Commission to consider the following:

1. **We would like to reaffirm our 45-day language comments submitted on June 18, 2021.**
2. **Recommending an expansion of the buried ducts language and acceptable assemblies as follows:**
  - a. Remove the requirement for uniform insulation level across the attic plane for the *Buried Ducts* option
  - b. Allow mounding of the insulation around the ducts for the *Buried Ducts* option
  - c. Remove the requirement for a containment barrier for the *Deeply Buried Ducts* option
  - d. Allow mounding of the insulation around the ducts for the *Buried Ducts* option
  - e. Consider conditions under which Buried Ducts and/or Deeply Buried Ducts offer equivalent performance to ducts in conditioned space

Initial justification for these buried duct recommendations include:

- The CEC has not provided substantial reasoning for continuing its overly restrictive and arguably burdensome approach to buried ducts assemblies – while some advances were made in the 2019 energy code, we believe more should be done especially when considering trade labor constraints do not appear to be easing for the foreseeable future
- The CASE Team should be directed to provide a review of current buried duct assemblies from both Prescriptive and Performance approaches for maximum efficiency gain and market flexibility
- Consistency with national model energy codes and recent state specific code adoptions such as one can find with the State of Oregon wherein:
  - No such additional restrictive criteria exist
  - The State of Oregon has recognized the performance of buried ducts as being equivalent to ducts in conditioned space under less restrictive criteria than even the model energy codes
- Acknowledgement of existing strategies for mitigating any potential for wind washing of the mounded insulation such as baffles at roof vents or other techniques
- Inclusion of other best practices to enhance the performance of a more traditional buried ducts approach including:
  - Reasonable duct tightness expectations
  - Insulation flags or markers to verify insulation depth and duct locations
  - Specific modeling and inspection requirements for mechanical calculations to properly include ALL buried duct assembly factors to more accurately right-size equipment and distribution systems

Regards,



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