

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-BSTD-03
<b>Project Title:</b>	2022 Rulemaking for Part 11 (CalGreen) and Parts 2-5 of the Building Standards Code
<b>TN #:</b>	239321
<b>Document Title:</b>	North American Insulation Manufacturers Association Comments - NAIMA California Energy Commission CalGreen Comment Letter
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	North American Insulation Manufacturers Association
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/16/2021 9:12:04 AM
<b>Docketed Date:</b>	8/16/2021

*Comment Received From: North American Insulation Manufacturers Association*  
*Submitted On: 8/16/2021*  
*Docket Number: 21-BSTD-03*

**NAIMA California Energy Commission CalGreen Comment Letter**

Attached doc.

*Additional submitted attachment is included below.*



**VIA E-MAIL**

August 16, 2021

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: 2022 ENERGY RULEMAKING for Part 11 (CalGreen) and Parts 2-5 of the Building Standards Code – Docket 21-BSTD-03

To Whom It May Concern:

The North American Insulation Manufacturers Association (“NAIMA”) submits the following comments on proposed revisions to the 2022 Rulemaking for Part 11 (CalGreen) and Parts 2-5 of the Building Standards Code in response to a request for public comments issued on July 2, 2021. NAIMA is the trade association for the North American manufacturers of fiber glass and rock and slag wool insulation products. NAIMA promotes energy efficiency and pollution reduction through energy savings achieved through the use of thermal insulation products.

NAIMA appreciates California’s efforts to continually update their building codes to advance energy efficiency while maintaining cost-effective building practices. Toward that end, it is unclear how the values in Table A4.203.1.1 were developed. The change that combined the table does not indicate how the new values were calculated. It is unclear how these values coincide with the base code. Please provide additional context on these changes and indicate how CalGreen dwellings perform compared to the base Title 24 energy code.

California has long been a leader in energy efficiency. In fact the American Council for an Energy-Efficient Economy has ranked them the top state in the nation on their [2020 State Energy Efficiency Scorecard](#). However, California earned a half point less on this year’s scoring compared to the previous year and only scored a 7.5 out of 9 on the Building Policies section. As California looks to mandate residential solar and include robust incentives for smart heat pumps, it can also improve its Building Policies score by prioritizing envelope energy efficiency. CalGreen is the logical policy tool to give priority to envelope energy efficiency measures that deliver benefits for the life of a building.

The June 2021 Codes and Standards Enhancement (“CASE”) Initiative report outlined key recommendations for Title 24, Part 11 (CalGreen). NAIMA supports the CASE report recommendations that two measures be required for compliance in CalGreen. NAIMA supports this recommendation and suggests that the Commission go further and require that at least one of the two compliance options improves the building enclosure.

The CASE report also outlines additional options to be added to Tier 1 and Tier 2 prerequisite options including key provisions to enhance the building enclosure like high performance

fenestration and HERS-verified reduced building air leakage. There are additional building enclosure options that go beyond high-performance attics, HPW, and the additional ones proposed by the CASE team. For example, buried ducts is a high-performance practice that can save a significant amount of energy and should be included in prerequisite options.

## CONCLUSION

NAIMA urges the Commission to consider the following:

- Prioritize the building enclosure;
- Require two measures as a prerequisite for Tier 1 and Tier 2, one of which related to the building enclosure;
- Provide more detail on how table A4.203.1.1 was calculated;
- Provide more detail on what percent energy savings CalGreen goes beyond base code; and
- Add buried ducts as a high-performance prerequisite option.

NAIMA supports California's efforts to continue to improve their residential building codes. Please contact me at [jmartell@naima.org](mailto:jmartell@naima.org) if you have any questions or would like to discuss NAIMA's comments in more detail.

Sincerely,

*Joel Martell*

Joel Martell  
Director – Technical Services