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North American Insulation Manufacturers Association Comments

Additional submitted attachment is included below.

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Docket: 22-DECARB-03

Equitable Building Decarbonization Direct Install Program: Draft Guidelines, Comments of the North American Insulation Manufacturers Association

The North American Insulation Manufacturers Association (NAIMA) is the trade association for manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation using fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials. NAIMA member companies own and operate three fiber glass manufacturing facilities in California.

The draft program guidelines state that program administrators will be responsible for developing a set of packages of eligible measures for building improvements that achieve utility bill savings and greenhouse gas emission reductions in participating households while improving indoor air quality, resiliency, and grid reliability. These outcomes are best achieved by establishing a programmatic presumption that packages will include necessary air sealing and the installation of attic insulation meeting, to the maximum extent practicable, the minimum prescriptive requirements of California's 2022 Title 24 residential energy code along with the installation of heat pump heating and cooling equipment and heat pump water heaters.

The primary purpose of insulation and air sealing products is to reduce building energy use for the life of the building without the need for replacement. Most insulation materials are domestically manufactured and are readily available and easily installed. Basic air sealing and insulation upgrades to existing homes often result in energy savings of 10-45 percent, depending on the climate zone.¹ These upgrades can translate into substantial homeowner savings and meaningful climate reductions.

Insulation is not driven by the "break and replace" cycle that characterizes heating and cooling system replacement. Yet insulation and air sealing are critically important in ensuring proper heating and cooling system operations. A well-insulated home helps ensure that it is truly "heat pump ready." Otherwise, installing a heat pump in a poorly insulated home could expose the occupant to dramatically increased heating and cooling costs. Such an outcome worsens the energy burden already shouldered by low- and moderate-income households. Additionally,

¹ "Insulation Opportunity Study, ICF (August, 2022)

https://www.insulationadvocacy.org/files/ugd/bb658f_fa77af9cf52e4329bbcf28cc1c20a35.pdf

improving envelope efficiency sometime after new heat pump installation can result in an oversized HVAC system, reducing its projected efficiency and adversely affecting occupant comfort. It is important that envelope efficiency and heat pump replacement are coordinated activities installed at the same time. The average residential customer who adds insulation and air sealing to HVAC electrification can expect to save between \$150 and \$1200 per year, with much of the savings appearing in the \$500–\$800/year range.

California's loading order calls for pursuing all cost-effective efficiency resources before using cost-effective renewable resources then conventional energy sources to meet demand. This same principle should apply to state policies meant to decarbonize buildings. Prioritizing a highly efficient building envelope in tandem with electrification measures is the surest path for fulfilling the stated goals of both the Equitable Decarbonization Direct Install Program and meeting the building decarbonization goals of the state.

Respectfully,

Curt Rich
President and CEO
North American Insulation Manufacturers Association