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*Comment Received From: Abe Cubano
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Support for Buried Ducts Changes in 2025

Additional submitted attachment is included below.



Chris Andrews
Director of Quality, Engineering, and Technology
LP Building Solutions
1610 West End Ave, Suite 200
Nashville TN 37203
Chris.Andrews@LPCorp.com
(423) 463 6995

September 15, 2023

California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814

Subject: Support for Proposed Changes to Buried Ducts in the 2025 California Energy Code

Dear Members of the California Energy Commission,

I am writing on behalf of LP Building Solutions to express our strong support for the proposed changes to the 2025 California Energy Code Title 24 Part 6. Specifically, we endorse the following proposed changes as discussed in the August 17, 2023 - 2025 Pre-Rulemaking Staff Workshop

- ****Exempt Mandatory Roof Deck Requirements When Ducts Are Fully Buried in Attic Insulation:**** LP commends the initiative to revise the mandatory requirements of Section 150.0(a)1 to eliminate the roof deck insulation requirement of a 0.184 U-factor for Climate Zones 4 and 8 through 15 when ducts are fully buried. This change is a significant step towards optimizing energy efficiency while also simplifying construction practices. These changes align with LP's commitment to sustainable building practices and will help reduce energy consumption in residential structures.
- ****Introduce New Simplified Compliance Path and Verification Procedures:**** LP wholeheartedly endorses the introduction of a new simplified compliance path and verification procedures. The proposed update to effective R-values in Tables 15 through 20 of the Single Family Residential Alternative Calculation Method Reference Manual (ACM Manual) is a welcome addition. This enhancement will streamline compliance processes and enable more straightforward adherence to energy efficiency standards. By providing builders and contractors with clear guidelines and methods for compliance, these changes will not only improve energy performance but also enhance the overall building process.

At LP Building Solutions, we are committed to promoting sustainable building materials and construction practices that align with evolving energy codes and standards. We understand that a vented attic with Buried Ducts and radiant barrier will create a high-performance attic in California. An attic with buried ducts will also reduce building cycle time, take less labor to install, and most importantly, be safer to install when compared to the existing Option B High Performance Attic.



LP firmly believes that the proposed changes to the 2025 California Energy Code Title 24 Part 6 are a positive step forward in achieving our shared goals of energy efficiency and environmental responsibility.

If you require any further information or assistance, please do not hesitate to contact me. I am eager to collaborate with the Commission in any way that supports the implementation of these crucial changes.

Sincerely,

A handwritten signature in black ink that reads "Chris Andrews".

Chris Andrews
Director of Quality, Engineering, and Technology
LP Building Solutions