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Comment Received From: Sergio Luconi
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Support for Buried Ducts Changes in 2025 Energy Code

Additional submitted attachment is included below.

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 the Reflective Insulation Manufacturing Association International (RIMA-I), and we are writing to convey our enthusiastic endorsement of the proposed modifications to the 2025 California Energy Code Title 24 Part 6. Our endorsement specifically pertains to the discussed changes outlined in the August 17, 2023 - 2025 Pre-Rulemaking Staff Workshop

- Exempt Mandatory Roof Deck Requirements When Ducts Are Fully Buried in Attic Insulation: We applaud the effort to amend the mandatory stipulations outlined in Section 150.0(a)1, particularly the removal of the roof deck insulation requirement with a 0.184 U-factor for Climate Zones 4 and 8 through 15 when ducts are fully buried. This adjustment signifies a significant advancement in bolstering energy efficiency and simplifying construction practices. These changes align seamlessly with our commitment to sustainable construction methods and will play a pivotal role in reducing energy consumption in residential structures.
- Introduce New Simplified Compliance Path and Verification Procedures: We enthusiastically support the introduction of a new, simplified compliance pathway and verification procedures. The proposed update to the effective R-values in Tables 15 through 20 of the Single Family Residential Alternative Calculation Method Reference Manual (ACM Manual) is a welcomed inclusion. These improvements will streamline compliance procedures and facilitate easier adherence to energy efficiency standards. By furnishing builders and contractors with clear guidelines and compliance methods, these revisions will not only enhance energy performance but also streamline the overall construction process.

At RIMA International, we are dedicated to promoting sustainable building materials and construction practices that align with evolving energy codes and standards. We recognize that a vented attic with Buried Ducts and a radiant barrier will constitute a high-performance attic in California. The inclusion of buried ducts not only reduces construction cycle time but also requires less labor for installation, significantly enhancing safety when compared to the existing Option B High Performance Attic.

We firmly endorse the belief that the proposed amendments to the 2025 California Energy Code Title 24 Part 6 represent a positive stride toward achieving our mutual objectives of enhanced energy efficiency and environmental responsibility.

If you require any additional information or assistance, please do not hesitate to reach out. We are enthusiastic about collaborating with the Commission in any way that promotes the successful implementation of these critical changes.

Sincerely,



Sergio Luconi
RIMA-I President

It's About Saving Energy