

DOCKETED

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**Comments and Requests on 2025 Energy Code Pre-Rulemaking “
Express Terms**

Additional submitted attachment is included below.



December 28, 2023

California Energy Commission
Attention: Docket No. 22-BSTD-01
715 P Street Sacramento, California 95814

RE: 2025 Energy Code Pre-Rulemaking – Express Terms

Commissioners:

Owens Corning is a global leader in building materials, systems and solutions, including insulation. 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 continue to remain engaged in the code development process and for this cycle we have been pleased to see some movement to enhance the overall efficiency, durability and resiliency of California's housing stock, while also maintaining options for compliance.

Specifically, we submit the following perspectives for additional consideration:

1. Exception 2 to Section 150.0(a)1:
 - a. We applaud the Commission's inclusion of this language in the Express Terms. As we noted in our previous comments, this is a necessary correction to the 2022 code language which perhaps unintentionally, limited builder choice in how they meet the performance benchmarks of the code.
 - b. It is our understanding that upward revisions to the effective R-value of buried ducts is also going to be included as originally proposed by the CA Statewide Utility Codes and Standards Enhancement (CASE) Team. We appreciate the data the CASE team provided and support this change.
 - c. We see no reason for this revised language not to make it through the regulatory process and into the final code language – since it is an option available to builders, there is zero regulatory financial impact. There also is no negative compliance impact as currently written.
2. Mechanical Trade-offs and Bifurcated Energy Design Ratings (EDR):
 - a. We concur with previous comments submitted by the North American Insulation Manufacturers Association, American Chemistry Council and Polyisocyanurate Insulation Manufacturers Association, wherein:
 - i. Mechanical trade-offs against the building envelope are detrimental to California's long-term efficiency and carbon reduction goals;
 - ii. High-performance mechanical systems should be a complimentary efficiency building block vs. a competitive barrier to building efficiency targets;

- iii. Further solidifying this approach via more distinct EDR pillars is the clearest and most effective way to secure the State's efficiency gains while also providing the market the most flexible compliance paths within the current regulatory environment

We at Owens Corning recognize the delicate balance and market realities our customers and their customers must deal with when it comes to code compliance and housing affordability. Maintaining flexibility in building and energy codes, where appropriate, is a critical component to maintaining a healthy and sustainable housing and construction industry.

Regards,

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