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| <b>Docket Number:</b>   | 24-BSTD-01  |
| <b>Project Title:</b>   | 2025 Energy Code Rulemaking   |
| <b>TN #:</b>            | 256800  |
| <b>Document Title:</b>  | North American Insulation Manufacturers Association<br>Comments on IBE and CBIA comments - Title 24 |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | North American Insulation Manufacturers Association   |
| <b>Submitter Role:</b>  | Public  |
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*Comment Received From: North American Insulation Manufacturers Association  
Submitted On: 6/11/2024  
Docket Number: 24-BSTD-01*

**NAIMA comments on IBE and CBIA comments - Title 24**

*Additional submitted attachment is included below.*



**VIA E-COMMENT**

June 11, 2024

J. Andrew McAllister, Ph.D.  
Commissioner  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

RE: 2025 Building Energy Efficiency Standards, Title 24, Parts 1 and 6, Express Terms, 45-Day Language (Docket Number: 24-BSTD-01); The North American Insulation Manufacturers Association's ("NAIMA") Comments on the Institute for the Building Envelope ("IBE") and the California Building Industry Association's ("CBIA") Comments Submitted June 4, 2024

Dear Commissioner McAllister:

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. Three of NAIMA's member companies operate production facilities in California.

NAIMA appreciates the opportunity to address the recent comments submitted by the Institute for the Building Envelope ("IBE") and the California Building Industry Association ("CBIA") dated June 4, 2024. Rather than engaging in continued point-by-point rebuttals through which the context of the original arguments can be easily lost, NAIMA stands by its previous comment submission, as well as those made by Owens Corning and Johns Manville. If continued dialogue is warranted, we recommend that it take place via a more appropriate medium through which the myriad of technical and process concerns can be more adequately addressed. NAIMA remains committed to supporting flexible compliance paths and options for builders to deliver more cost-effective housing to consumers within the current process framework.

The California Energy Commission ("CEC") has set the gold standard for energy efficiency and has demonstrated commendable dedication to engaging stakeholders, conducting fair and transparent development processes, and revolutionizing California's building standards. NAIMA commends the CEC's efforts and simply urges the continuation of fair and consistent practices. The requests from IBE and CBIA seem to seek a shortcut to the established process wherein stakeholders, experts, and other interested parties can contribute to discussions on changes in a fair and impartial manner. The evolution of Title 24 should proceed within the existing framework, and any attempts to circumvent this established process, whether through legislative means or otherwise, should be avoided. The integrity of Title 24's development must be consistently upheld.

J. Andrew McAllister, Ph.D.

June 11, 2024

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NAIMA welcomes the opportunity to meet with you to discuss the issues outlined above. Thank you for your consideration of these comments.

Sincerely,

Jason Vandever

Director of Technical Services, NAIMA