

DOCKET

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Comments on proposed 2013 California Energy Efficiency Standards
Submitted by email to docket@energy.state.ca.us

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Continuous insulation is an effective means to increase the performance of homes and other buildings. However, the proposed update to the 2013 Energy Standards does not go far enough to recognize insulated siding as a form of continuous insulation. Insulated siding has been recognized across the country as an efficient way to provide insulation and cladding in a single product, including in the 2012 International Energy Conservation Code. We are submitting the following comments to recognize insulated siding as equivalent to insulated sheathing:

1. Modify Footnote 4 to Table 150.1 C in Section **150.1 Res General Performance and Prescriptive** to include the term “insulated siding” as follows:

4. “R-13+4” means R-13 cavity insulation plus R-4 continuous insulated sheathing and/or insulated siding. “R-13+4, 20” means R-13 cavity insulation plus R-4 continuous insulated sheathing and/or insulated siding, or R-20 cavity insulation.

2. Add a new term and definition to **Appendix JA1 – Glossary as follows:**

Term: Continuous insulation

Definition: Insulating sheathing and/or insulated siding applied to a wall to prevent the framing or structure from forming a thermal bypass between the exterior and the conditioned space.