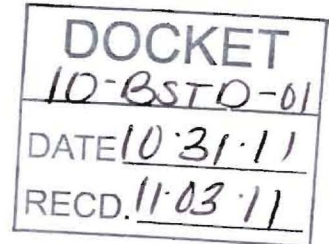




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October 31, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512



Re: SPFA Comments on Draft Language - October 13 & 14, 2011 Workshop on the 2013 Building Energy Efficiency Standards

Dear CEC Staff:

In reference to the October 27, 2011 letter from Spray Polyurethane Foam Alliance's CEC Title 24 Workgroup, I am writing to fully support the comments they provided on the draft language posted to the California Energy Commission (CEC) website and to be presented at the October 13-14 CEC workshop on the 2013 California Building Energy Efficiency Standards. We appreciate your consideration of our support. Open and closed-cell spray polyurethane foam (SPF) insulation provide builders and homeowners the best option to insulate and air-seal their buildings. SPF delivers superior and consistent thermal performance and serves as an air barrier material when installed at typical insulation thicknesses. SPF roofing products provide a continuous insulation, water sealing, and can be easily covered with reflective coatings that meet cool-roof requirements in California.

It appears that the current draft language may adversely affect the use of SPF insulation and roofing products. Specifically, we are concerned that the language of the current documents may have the following impacts:

- Elimination of open-cell SPF and all loose-fill fibrous insulations in 2x4 and 2x6 walls.
- Force all SPF products to have the same minimum R-value (lower than BEARHFTI values)
- Mandate full-cavity fill for SPF to comply with JA4 U-value Tables
- Require excessive SPF thicknesses to meet air-barrier requirements

The State of California and the CEC are responsible to set policy that offers a benefit to the citizens of California, their environment, and their standard of living. It appears to me that the CEC is operating with a mandate to make existing standards more stringent, but without an economic basis for the changes, and a full picture of the building science behind the changes that have been proposed.

I understand that CEC staff receives many comments from individual citizens, industry organizations and other stakeholders during the development of the 2013 Building Energy Efficiency Standards. I want to

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be sure that, as a spray foam contractor, the issues raised by SPFA are considered properly addressed before these documents are posted for the 45-day public review.

Your attention and response to SPFA's comments is appreciated. The SPF industry wants to ensure that the results of the 2013 Title 24, Part 6 process are energy efficiency standards that make practical sense for the consumer and ensure that they continue to have the choice of insulation materials that they want and that make sense for their home or building.

As a SPF contractor, I am ready and willing to assist CEC staff to work through the science, technology, and economics related to insulation materials and systems. Please do not hesitate to contact me if you have any comments or questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jo Morgan". The signature is fluid and cursive, with the first name "Jo" and last name "Morgan" clearly distinguishable.

Jo Morgan
Co-Owner, Performance Foam Tech