

ENERGY CALC CO.
Building Energy Consultants

DOCKET 10-BSTD-01
DATE 10.31.11
RECD. 10.31.11

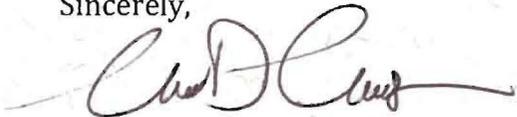
October 31, 2011

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

Dear CEC Staff:

I am writing in support of the comments made by the Spray Polyurethane Foam Alliance's CEC Title 24 Workgroup concerning draft language in the 2013 Building Efficiency Standards. The suggested changes in the draft language would result in a more equitable insulation marketplace. Building science points clearly to spray foam insulation providing better thermal performance than fiberglass due to being a superior air barrier. Building code should not point us in the other direction.

Sincerely,



Chuck Clemons, Owner, C.E.P.E.