

Nov 12, 2014

Sent via email to: [docket@energy.ca.gov]

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento CA 95814-5512
Attn: Mazi Shirakh

**RE: Docket No. 14-BSTD-01
2016 California Title 24 Update Process: November 3rd Hearing**

To Whom it May Concern,

SDI Insulation is a privately owned, full service insulation business in the greater Bay Area and is one of the largest insulating contractors in the region. Our customer have come to see us as a leader in providing effective insulation and air sealing solutions that exceed their expectations, and that are far ahead of prescriptive code requirements. They know that we are able to provide products that actually work instead of just complying with a Title 24 report.

SDI Insulation appreciates this opportunity to provide comment regarding the November 3rd hearing on the California Energy Commission's ("Commission") 2016 Title 24 Update Process. We are encouraged to see the emphasis on using roof-deck insulation to reduce attic temperatures and improve the efficiency of California homes, and we support the Commission's efforts to make High Performance Attics (HPAs) part of the Title 24 Standards. Spray foam insulation is a tested, proven, and well understood method for creating HPAs; a method which provides a combination of insulating and air sealing benefits not found in other technologies. Now we have to make sure California keeps up with other areas of the country in using this advanced method instead of stepping backwards and restricting or "hiding" its use within the energy code.

In order to achieve maximum benefit from below-roof-deck application of spray foam, the attic should be unvented to prevent the movement of unconditioned air into the attic and home. This is basic and well understood in most parts of the country and has been part of the IRC and CRC code (CRC R806.5) for some time. However, it was embarrassing for our State to see that unvented attic (UVA) designs were notably absent from the HPA presentation delivered on November 3rd. This omission is of great concern to (me and to SDI Insulation, as unvented attics had been highlighted as a prescriptive compliance option in earlier presentations, such as the one delivered by the same presenter on July 21st.

In the July 21st code hearing, spray foam UVAs were presented alongside vented above-deck rigid foam insulation and below-deck fiberglass/cellulose attics as proposed compliance options. In response to a question from the audience, the presenter stated that unvented designs would still be a performance option for meeting the code. However, as of now the compliance software does not allow the user to model a “conditioned” or “unvented” attic, so early-adopters looking to build highly efficient homes and to get out ahead of the 2016 code will likely look to other technologies. In speaking with our customers they have been incredulous that the CEC would do anything but promote a system that they already know works better than almost anything else they have tried. Not only is spray foam one in an unvented attic one of the single most effective way to increase comfort and reduce energy costs in a home, it also has a dramatic effect on Time Dependent use of electricity which is of utmost importance to our State. The significantly effective reduction in heat gain through the roof system has been one of the single biggest drivers of customer demand for this system at SDI and across the United States.

The rationale for why unvented attics were removed from consideration as a prescriptive compliance option was not clearly communicated during the presentation. We respectfully request the Commission’s assistance in helping our industry understand why UVA designs were not included in the November 3rd hearing, and whether the Commission considers the decision to remove UVAs as a prescriptive option to be final. We do not want us to step backwards in California and cripple our ability to use this proven method.

Our industry and other industry stakeholders would be happy to provide the Commission with any data or information on unvented spray foam attics that could assist with the development of inclusive regulations to save energy in California homes. We appreciate the opportunity to contribute to the code update process and look forward to a continuing conversation with staff as the Commission develops language for the 2016 Standards.

Sincerely,

James Morshead
Senior Project Manager, Building Science and Codes.
SDI Insulation. Inc.