



## SWD URETHANE

*Celebrating 40 years of foam*

540 S Drew Mesa, AZ 85210

800-828-1394 swdurethane.com

November 19, 2014

Sent via Email

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento CA 95814-5512  
Attn: Mazi Shirakh  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)



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

Dear Mazi Shirakh,

SWD Urethane manufactures a wide product line including over 30 polyurethane and polyurea products. The product development team is committed to leading the industry with innovative products, including the first and only code-approved 'extreme cold' spray foam, and first to market with 'no heat' spray foam.

SWD Urethane is led by Steve Perkins, CEO and Jim Perkins, President. Steve and Jim are committed to maintain SWD's independence and deliver meaningful solutions to our customers. Both Steve and Jim serve on numerous industry boards and committees to help increase the awareness and acceptance of polyurethane products.

SWD Urethane appreciates the opportunity to provide comments on the November 3<sup>rd</sup> hearing on the California Energy Commission's (Commission) 2016 Title 24 Update Process. We are encouraged to see the Commission's emphasis on the use of roof-deck insulation to reduce attic temperatures and improve the efficiency of California homes, and we support your efforts to make High Performance Attics (HPAs) part of the Title 24 Standards. The use of spray polyurethane foam (SPF) insulation is a tested and proven method for the construction of HPAs by providing a combination of insulating and air sealing benefits not found in other technologies.

In order to achieve maximum benefit from below-roof-deck application of SPF, the attic should be unvented to prevent the movement of unconditioned air into the attic and home. However, we understand that unvented attic (UVA) designs were notably absent from the HPA presentation



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delivered on November 3<sup>rd</sup>. This omission is of great concern to SWD Urethane, as UVA designs had been highlighted as a prescriptive compliance option in earlier Commission presentations (such as the one delivered by the same presenter on July 21, 2014). This omission has left the SPF industry concerned about the future of UVAs in the Title 24 update process.

During the July 21<sup>st</sup> code hearing, SPF UVAs were presented alongside vented above-deck rigid foam insulation and below-deck fiberglass/cellulose attics as proposed prescriptive options. We understand that the Commission has since changed its position and plans to include UVA design only as a performance option for meeting the code. However, the current version of the compliance modeling 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.

The rationale for why UVAs were removed from consideration as a prescriptive compliance option has not been clearly communicated to the SPF industry. We respectfully request the Commission’s assistance in helping our industry understand why UVA designs were not included in the November 3<sup>rd</sup> hearing. We are especially interested in learning what information the Commission needs in order to (1) reinstate UVAs as a prescriptive option, or (2) correct the errors in the energy modeling software to allow for UVAs as a performance option.

SWD Urethane and other industry stakeholders would be happy to provide the Commission with any data or information on SPF UVAs that can 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 Title 24 Standards.

Sincerely,  
Paul Warren  
Building Scientist/ Codes and Engineering Manager