

RTE

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November 24, 2014
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

14-BSTD-01

TN 74060

NOV 24 2014

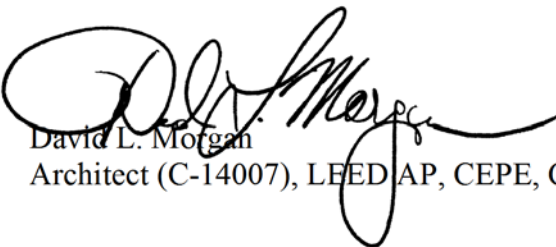
Subject: Requesting change to Title 24 – Part 6 Section 120.7(a)3C

The current requirement outlined in Section 120.7(a)3C is vague and could be interpreted to apply the 2,000 sf area limitation on removable ceiling panels to individual tenant improvements or additions based on the current definition of a “building” under the standards. The following modification to the exception in Section 120.7(a)3C would clarify that the 2,000 sf limitation applies to the entire structure and not individual tenant improvements and additions.

EXCEPTION to Sections 120.7(a)3C: *Conditioned spaces where the average height between the ceiling and the roof exceeds 12 feet, and the total aggregate area of all removable ceiling panels in the entire building is 2,000 square feet or less, insulation may be placed in direct contact with removable ceiling panels when the overall TDV energy use does not exceed the allowable energy budget using the Performance Approach.*

I respectfully request the Energy Commission staff consider the modification provided above when preparing the 2016 Building Energy Efficiency Standards.

Sincerely,



David L. Morgan
Architect (C-14007), LEED AP, CEPE, CEA