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January 29, 2015

To: Commissioner Andrew McAllister
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

14-BSTD-01

TN # 74445

JAN 30 2015

Docket: 14-BSTD-01

From: ATCO Rubber Products, Inc.

RE: Draft 2016 Building Energy Efficiency Standards

Dear Commissioner McAllister:

ATCO Rubber Products, Inc. is a leading manufacturer of flexible air ducts for the HVAC industry with twelve (12) manufacturing locations in ten (10) states including our factory in Sacramento, California. Our flexible duct products are installed in new and existing residential and commercial applications in California and all areas across the nation. We have been actively following the development process of the California Energy Code.

ATCO strongly objects to JCEEP proposed amendments to the draft 2016 Building Energy Efficiency Standards (BEES) to limit the use of flexible duct in construction. We require that our air ducts be installed to stringent installation specifications per the requirements of our listing and certifications and as such, they should perform to the highest quality standard. ATCO supports the California Energy Commission (CEC) in the development of building installation standards and quality installation inspections and diagnostics to document properly installed HVAC systems.

HVAC systems installed in California must meet the fan flow and fan efficiency requirements in the 2013 BEES. These HVAC system performance requirements are 100% tested by the installing subcontractor and are tested via sampling by a CEC certified Home Energy Rater (HERS). These mandatory performance requirements of the HVAC system can only be met if the system is performing to sound design specifications and is a quality installation. A significant portion of HVAC systems that pass these rigorous quality standards continue to use flexible ducts without arbitrary length limitations.

ATCO strongly objects to JCEEP's proposal that disregards the CEC's HVAC quality installation guidelines and quality test procedures. Banning the use of all but five feet of flexible ducts in residential and small commercial building is arbitrary and capricious. ATCO supports the development of the 2016 Standards without these arbitrary restrictions placed on flexible duct installed length.

Sincerely,

Chip Kirkland
Vice-President Sales

cc: Rob Oglesby, CEC Executive Director
Dave Ashuckian, CEC Deputy Director of the Efficiency & Renewable Energy Division
Patrick Saxton, CEC Advisor to Commissioner McAllister
Maziar Shirakh, CEC 2016 staff leader
Robert E. Raymer, CBIA Technical Director