



Center for the
Polyurethanes Industry

February 27, 2015

Sent via Email

Commissioner McAllister
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
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California Energy Commission

DOCKETED

15-BSTD-01

TN # 75233

FEB 27 2015

**RE: Docket #15-BSTD-01
CPI/SFC Comments on California Energy Code 45-Day Language**

Dear Commissioner McAllister,

The Center for the Polyurethane Industry's Spray Foam Coalition^{1,2} ("SFC") is pleased to submit the following initial comments to the California Energy Commission ("CEC") regarding proposed changes to Title 24, Part 6 ("California Energy Code").

Upon review of the 45-day language, the SFC strongly supports High Performance Attics (HPAs) as a major step to reduce energy consumption and peak load in California. In order to highlight the importance of HPAs, the SFC requests that Unvented Attics (UVAs) be listed as a prescriptive pathway for HPAs in the 2016 California Energy Code.

UVAs constructed using spray polyurethane foam (SPF) are one of the most tried, tested, and proven HPA construction methods. UVAs can increase energy efficiency by reducing cooling loads and air leakage through a home's attic and HVAC equipment. UVAs have been constructed throughout the United States and the energy savings benefits are well documented in field studies and modeling outputs.

Furthermore, the SFC encourages the CEC to formally recognize the benefits of reducing air leakage with air impermeable insulation under the roof deck in UVAs. Products like air-

¹ The Center for the Polyurethanes Industry (CPI) of the American Chemistry Council serves as the voice of the polyurethanes industry in North America, promoting its development and coordinating with polyurethane trade associations across the globe. The polyurethane industry supports research and initiatives that serve its communities and customers. The business of polyurethane is a \$26.5 billion enterprise and a key element of the U.S. economy. The industry operates in more than 1,000 locations in the U.S. and directly employs more than 46,500. A major job creator in the U.S., each job in the polyurethanes industry yields five more jobs indirectly for an approximate total of 235,000 jobs supported.

² The Spray Foam Coalition (SFC) champions the use of spray polyurethane foam in U.S. building and construction applications and promotes its economic, environmental and societal benefits while supporting the safe manufacture, transport, and application of spray polyurethane foam. SFC consists of manufacturers of spray polyurethane foam systems as well as suppliers of raw materials and machinery used to apply the foam.



impermeable SPF can provide additional energy savings by combining high R-values with a reduction in air leakage.³

The SFC looks forward to participating in the rulemaking process going forward. We would welcome the opportunity to meet directly with CEC staff representatives to discuss our proposals in more detail. In the interim, please do not hesitate to contact me at Justin_Koscher@americanchemistry.com, (202) 241-6617, or Rick Duncan, rickduncan@sprayfoam.org, (410) 920-9920, with any questions.

Kind regards,



Justin Koscher
Director
Center for the Polyurethanes Industry

³ As an example of these potential energy savings, nearly 3,600 single-family homes were built in 2013 in California using SPF insulation, resulting in an estimated combined cost savings of up to \$3.3 million annually. Energy savings from these homes insulated with SPF could eliminate 800,000 metric tons of carbon dioxide emissions from entering the California environment over the life expectancy of the homes. This is equivalent to removing approximately 2,700 cars from California's roads every year. These estimates are based on information collected by the Spray Foam Coalition.