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**Sent:** Thursday, March 19, 2015 9:31 AM  
**To:** Shirakh, Maziar@Energy  
**Cc:** Bruce Wilcox; Dane Stevenson  
**Subject:** Docket 15-BSTD-01: HPA + WHFan Issue

California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN 75473**

**MAR 19 2015**

Dear Mazi,

I would like this listed on docket 15-BSTD-01 as a public comment for 2016 code, and am requesting an exception to be added to the definition and application for the unvented HPA.

- 1- High Performance Attics contain an unvented attic prescriptive option.
- 2- Whole House Fans require # NFVA in the code, when prescriptively installed in CZ 8-14

These two measures conflict in their venting clauses if they both become prescriptive, and the unvented HPA is selected. How will a builder with unvented attics install whole house fan and take credit for both and meet code during install for both? I recommend this verbage / exception to be added to the standards for 2016, as there are products in existence that will vent the attic during whole house fan operation, that require no attic ventilation at all. Whole house fans and HPA do not need to be mutually exclusive, they can be used together, but you must include an exception to allow it, otherwise the venting requirement of whole house fan will disable it from being used in an unvented HPA.

**High performance, unvented attics, when used in conjunction with whole house fans, must provide powered exhaust from the attic to the outside, exhausting CFM from the attic by mechanical means that is equal or greater than the installed whole house fan CFM, wired for simultaneous operation when whole house fan is in operation. When not in operation, the powered attic exhaust system must seal and provide insulation value equal or greater than the modeled cathedralized insulation R-value. Attic exhaust equipment must be rated and certified for CFM on the CEC appliance database.**

**Please consider adding the exception for 2016 code, when HPA and WHFans will both be prescriptively required at the same time.**

Thank you,

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