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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

**Docket: 14-BSTD-01**

**From:** ATCO Rubber Products, Inc.

**RE: Draft 2016 Building Energy Efficiency Standards**

California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 75477**

**MAR 19 2015**

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