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California Energy Commission

DOCKETED

15-BSTD-01

TN # 75480

MAR 19 2015

February 3, 2015

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

Docket: 14-BSTD-01

RE: Docket: 14-BSTD-01 - Draft 2016 Building Energy Efficiency Standards

Dear Commissioner McAllister:

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member-companies involved in residential and light commercial construction. CBIA member-companies are responsible for over 90% of the new production-style homes built in California each year.

CBIA strongly opposes the Joint Committee on Energy and Environmental Policy (JCEEP) proposal to limit flexible duct to five feet in residential and commercial construction. Our members use flex duct almost exclusively for their HVAC systems. Over the past four updates of the energy efficiency standards, and as part of the current update of the code, duct tightness and performance of HVAC systems have vastly improved. The CEC requires HVAC systems to be 100% tested by the HVAC subcontractors and third party verified by a HERS rater to meet the Building Energy Efficiency Standards' HVAC performance requirements. Any suggestion to limit flexible ducts which are an integral portion of a well-designed and field-verified HVAC system is not acceptable to the building industry.

CBIA opposes any reduction or limitation to the use of flexible duct. It is the methodology the building industry uses to supply quality HVAC systems to our homes.

Respectfully,

Robert E. Raymer, P.E.
CBIA Technical Director

cc: Rob Oglesby, CEC Executive Director
Dave Ashuckian, CEC Deputy Director, Efficiency & Renewable Energy Division
Patrick Saxton, CEC Advisor to Commissioner McAllister
Mazi Shirakh, CEC lead staff for 2016 Standards