GABEL ASSOCIATES, LLC
BUILDING ENERGY ANALYSIS & ENERGY CODE COMPLIANCE

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75538
MAR 27 2015

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California Energy Commission
Attn: Docket #15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: 2016 Building Energy Efficiency Standards, Docket #15-BSTD-01
Recommended Additions to Reference Appendices Section JA4
Tables 4.2.2, 4.2.5, 4.3.1, 4.3.3 and 4.3.4

The current Tables 4.2.2 and 4.2.5 for framed rafter roofs, and Tables 4.3.1, 4.3.3 and 4.3.4 for framed walls need to be expanded to include higher levels of cavity insulation for each nominal framing size. The current tables include typical cavity R-values for standard and high density batt insulation levels, but do not include the default R-values for medium density closed cell spray polyurethane foam (ccSPF) which has substantially higher R-value per inch than batt insulation. Per the Joint Appendices Table 4.1.7, using ccSPF it would be possible to achieve R-19 in a 2x4 framing cavity, at least R-30 in a 2x6 framing cavity and over R-38 in a 2x8 framing cavity, so I recommend that all of the tables for framed rafter roof and wall assemblies be expanded to include higher cavity R-values consistent with filling the cavity with ccSPF.

Expanding the tables in this way will help easily document the legitimately higher cavity R-values that designers, builders, and homeowners may choose to install to help them comply with the 2016 Building Energy Efficiency Standards.

Thank you for your attention to this issue.

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Principal

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