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California Energy Commission
Attention: Docket No. 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento CA 95814

June 4, 2015

**Subject: Comments from the Steel Framing Alliance on Docket Number 15-BSTD-01
Adoption of 15 Day Language for the 2016 Energy Efficient Building Standards**

On behalf of the Steel Framing Alliance, we wish to thank the Commission for responding to our comments of March 12, 2015. Although we continue to stand behind our position that the proposed minimum insulation requirements in the 45-day language are inconsistent with the intent of performance compliance paths, the modification reflected in the 15 day language to Section 120.7 helps to increase the flexibility available to designers in determining how to best invest in energy efficiency.

One concern with the 15 day language is the way the language is written for demising walls at 120.7 (b) 7. B. We believe the proposed language is confusing and will inadvertently penalize innovative systems that meet the U-factor requirement but not the prescriptive description in the text. We propose a minor clarification and ask the commission to revise the text as follows:

B. Metal framed walls shall be insulated to meet a U-factor not greater than 0.151 ~~or have which is equal to~~ an installed R-value of not less than R-13 between framing members plus R-2 continuous insulation installed and ~~The wall assembly shall~~ have a minimum of ½ gypsum board as the other layer or an equivalent layer on each side.

There are assemblies on the market that can meet the U-factor requirement but that do not have gypsum board or the exact combinations of insulation described in the proposed 15-day text. Our proposed modification will clarify that an assembly must meet the U-factor requirement but also recognizes one allowable prescriptive solution for compliance.

We appreciate consideration of our comments and stand ready to answer any questions or provide additional information at your request.



Mark Nowak
Steel Framing Alliance