



California Energy Commission

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15-BSTD-01

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Sent via email to docket@energy.ca.gov

June 5, 2015

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

Subject: Comments from the North American Insulation Manufacturers Association on Docket Number 15-BSTD-01 2016 Building Standards 15-day language

To Whom It May Concern:

These comments are submitted on behalf of the North American Insulation Manufacturers Association regarding the proposed changes to the 2016 version of the California Building Energy Efficiency Standards, Title 24. NAIMA is the association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation through the use of fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials.

Following are specific comments to the proposed 15-day language:

SECTION 120.3 – REQUIREMENTS FOR PIPE INSULATION, (b) Insulation Protection, (item) 2.

Is proposed to be changed to read as follows:

2. Insulation covering chilled water piping and refrigerant suction piping located outside the conditioned space have a Class I or Class II vapor retarder. All penetrations and joints of which shall be sealed.

Class I and Class II vapor retarders are defined in the International Building Code as:

Class I: Sheet polyethylene, nonperforated aluminum foil with a perm rating of less than or equal to 0.1.

Class II: Kraft-faced fiberglass batts or paint with a perm rating greater than 0.1 and less than or equal to 1.0.

Class I, II and III vapor retarders refer to vapor retarders with perm ratings associated with building envelope insulation and most would not be acceptable for use on chilled water piping. Typically insulation on chilled water systems and piping is specified to have a perm rating of 0.02 or less. If a perm rating is to be specified for chilled water systems in Title 24, NAIMA recommends it be done as follows:

2. Insulation covering chilled water piping and refrigerant suction piping located outside the conditioned space shall have a ~~Class I or Class II~~ vapor retarder with a perm rating of 0.02 or less. All penetrations and joints of which shall be sealed.

The comment above also pertains to item B. on page 207 which is proposed to read:

- B. Insulation covering chilled water piping and refrigerant suction piping located outside the conditioned space shall have a Class I or Class II vapor retarder.

NAIMA recommends revising this item to read as follows:

B. Insulation covering chilled water piping and refrigerant suction piping located outside the conditioned space shall have a ~~Class I or Class II~~ vapor retarder with a perm rating of 0.02 or less.

Section 150.0 (a) 1.

(note – this a duplicate comment from NAIMA’s comments on the 45-day language)

NAIMA does not support the increase of the weighted average U-factor for ceilings and rafter roofs from 0.031 to 0.043 or the reduction of the R-value from R-30 to R-22. R-30 is the lowest prescriptive R-value contained in the International Energy Conservation Code (IECC) since 2006. A reduction of R-8 amount to approximately 2 inches of fiber glass insulation, which is inexpensive and easy to accommodate in most every attic and roof assembly.

Section 150.1 (c) 1. A and B and Table 150.1-A

(note – this a duplicate comment from NAIMA’s comments on the 45-day language)

NAIMA strongly supports the proposed revisions to increase the thermal efficiency of the roofs, ceilings and walls for low-rise residential buildings. The addition of high performance attics and high performance walls will reduce home owners utility bills, are cost-effective as presented at the hearings and will save energy for the life of the building.

Although the issue is was not included in the 45 or 15 day language, NAIMA continues to have strong objections to any proposal to allow photovoltaic systems to be used to tradeoff high performance attics and walls as well as other energy efficiency measures. NAIMA does not support provisions, which allow or encourage the reduction of permanent energy efficiency measures, like ceiling and wall insulation, to be reduced or eliminated using measures whose performance may change over time.

Thank you for your consideration of these comments. Please contact me if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles C. Cottrell". The signature is fluid and cursive, with the first name "Charles" and last name "Cottrell" clearly distinguishable.

Charles C. Cottrell
Vice President, Technical Services