Please docket my comment in 05-AAER-1

Glenn Anthony (Engineer)
October 3, 2005
Glenn1715@att.net
(805) 484-1715

California Energy Commission
Docket unit
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
(916) 654-5076

Docket Unit Administrator:

Enclosed is one signed original along with 11 additional copies of my docket comment concerning the proposed walk-in freezer envelop insulation value of R-36 as listed in the Amendments to Appliance Efficiency Regulations Title 20: Sections 1601-1608, Table A-6.

I have also sent an electronic submittal of the enclosed comment to the docket unit on October 3, 2005 at approximately 11:30 pm. I indicated that my comment be docketed in 05-AAER-1.

I have been in contact with Jim Holland at the Energy Commission concerning this comment, and I have sent him additional research information for the commissions use on resolving this issue.

I can be reached at the above inside phone or e-mail, if necessary.

Thank you

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The following concern is directed toward the California Energy Commission's Proposed Amendments to Appliance Efficiency Regulations Title 20: Sections 1601-1608, Table A-6, **specifically, walk-in freezer envelope insulation proposed value of R-36.**

The reason this concern was not brought to the commission's attention sooner is because nearly 80% of the leading walk-in companies in the nation (14 out of 19 that I spoke with) were never made aware of the commission's new regulations until just recently.

The current optimal industry standard for walk-in freezers is **four** inches of polyurethane insulation with a minimum **R-29** value. However, the commission's proposed value of **R-36** can only be achieved with **five** inches of polyurethane insulation; consequently, the proposed R-36 walk-in freezer regulation necessitates an industry switch from four to five-inch thick panels, creating detrimental economic effects for the following reasons: Producing five-inch thick panels on a regular basis ties up expensive tooling and slows production rates since the thicker panels require much longer press/mold cure times, and added material costs; thereby, resulting in substantially increased California end user prices. In addition, a majority of the high quality large national manufacturers cannot supply these panels since the cost of acquiring the five-inch tooling is excessive and even prohibitive. Furthermore, the companies currently offering five-inch panels, (now only used for the occasional extreme temperature or span conditions), would then have an everyday marketing advantage to raise the California end users price even higher.

As a compromise solution, I would like to make the commission aware that the maximum achievable four-inch polyurethane insulation value of **R-34** (or slightly higher) is now available with specific formulations of environmentally safe blowing agents. (Although some walk-in companies may not currently be aware of this fact.) This latest formulation is now available for all interested manufacturers at similar costs and requires only slight dispensing equipment modifications. This polyurethane formulation was developed, tested, and verified by a division of a well-known worldwide chemical insulation supplier. Two of the top five panel manufacturers in national sales have verified this four-inch R-value (at normal operating freezer temperatures), and one of these companies is currently in production with this formulation. (Specific company information was sent to Jim Holland.) In addition, similarly priced **R-34** four-inch thick extruded polystyrene insulation from Owens Corning is also now available for walk-in panel production.

In conclusion, by slightly reducing the proposed walk-in freezer envelope insulation value from **R-36 to R-34**, the commission would prevent the entire walk-in industry from having to switch from four to five-inch panels, and a majority of the manufacturers from facing overwhelming tooling expenses. The **R-34** value would enable all walk-in companies to comply without undue hardship or expense. Most importantly, the California end users would not be forced to buy expensive freezers from a select group of manufacturers at much higher prices just to meet an inconsequential two point difference in insulation value at this already substantially far superior insulating value.

Glenn Anthony