

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



February 11, 2016

Mr. Shawn Intagliata  
Director, Sustainable Business Development  
Unico, Inc.  
7401 Alabama Ave  
Saint Luis, MO 63111

**Re: POROUS INNER CORE FLEXIBLE DUCTS**

Dear Mr. Intagliata:

Thank you for your request seeking clarification of whether the prohibition of porous inner core flexible ducts found in Section 150.0(m)10 of the 2013 Building Energy Efficiency Standards (Standards) is applicable to Small Duct High Velocity (SDHV) systems.

As you are aware, Section 150.0(m)10 is a mandatory measure for residential construction, which states:

*"Porous Inner Core Flex Duct. Flexible ducts having porous inner cores shall not be used."*

This requirement was first introduced in the 2005 Standards and has not changed. During the 2005 Standards Rulemaking (Rulemaking), staff released the *Measure Analysis and Life-Cycle Cost Report* which clearly states that this requirement was for porous inner core flex ducts that use the outer vapor barrier as the **only** air barrier, given the increased potential for leakage.

However, not all porous inner core flexible ducts contain only one air barrier, such as models upc-26CR6 or upc-26CR8 that your company manufactures. These models have an inner and outer layer that both serve as air barriers; thus, they do not have the increased potential for leakage, which was the original concern that led to Section 150.0(m)10.

Based on the 2005 Rulemaking and Section 10-107(b) of the 2013 Standards that grants the Executive Director the authority to issue interpretations of any provision of the 2013 Standards, flexible ducts having a non-porous layer between the porous inner core and the outer vapor barrier satisfy the requirement of Section 150.0(m)10.

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If you have any further questions, please contact Mark Alatorre at (916) 654-4642.

Sincerely,

A handwritten signature in black ink, appearing to read 'R.P. Oglesby', with a long horizontal flourish extending to the right.

Robert P. Oglesby  
Executive Director

cc: Dave Ashuckian, P.E., Deputy Director, Efficiency Division  
Mark Alatorre, Mechanical Engineer, Building Standards Office