LOW-E
SOUTHWEST DISTRIBUTION

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75535
MAR 27 2015

DOCKET NO. 15-BSTD-01

March 30, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

We request that the proposed code change to 150.2(a) 1 not exclude additions greater than 700 square feet.

Flexible insulation such as ESP LOW-E ICC House Wrap will provide a continuous insulation without causing misalignment of walls and also provides an R-1 under stucco and an R-4 under siding.

With this, we propose the R-value for continuous insulation for the exterior of buildings be changed to an R-1.

Respectfully submitted,

C Snowder

Charlie Snowder
LEED AP

CC Payam Bozorgchami,P.E
Associate Civil Engineer

LOW-E
SOUTHWEST DISTRIBUTION

DOCKET NO. 15-BSTD-01

March 30, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

We respectfully request that Reflective Insulation systems for In Situ applications be added to the charts JA4.2-3, JA4.3, Table 4.3-1, Table 4.3-2, Table 4.3-3 and Addendum to JA 4.

In Situ applications that are using methods consistent with the ASHRAE Handbook of Fundamentals demonstrate R-value contribution to an assembly by reflective insulations.

Respectfully submitted,

C Snowder

Charlie Snowder
LEED AP

CC Payam Bozorgchami, P.E.
Associate Civil Engineer

LOW-E
SOUTHWEST DISTRIBUTION

DOCKET NO. 15-BSTD-01

March 30, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

We respectfully request the proposed code changes for continuous insulation for single-member headers not be removed from RA3.5.3.2.9, RA3.5.4.2.9, RA 3.5.4.2.9, RA 3.5.6.2.9 and RA 3.5.7.2.7 per the requirements placed on the California Energy Commission by the State of California.

Requirements:

"Do not prevent any product that helps meet the goals of the State of California and the California Energy Commission" and pursuant to the requirements of the Government Code Section 11346.2(b)(4)(A) "Requires the Energy Commission to include reasonable alternatives to the regulation that would lessen the impact on small business."

As a small business, we have already produced a continuous insulation for single-member headers that is being supplied to the building industry. Our product is a flexible reflective insulation that can be installed directly to the single-member header and is compatible with all exterior finishes from stucco to wood siding without causing any differential to the exterior finish.

Additionally, we request that the R-value of continuous insulation be reduce to a R-1

Submitted by,

Charlie Snowder

CC Payam Bozorgchami, P.E
Associate Civil Engineer

LOW-E
SOUTHWEST DISTRIBUTION

DOCKET NO. 15-BSTD-01

March 30, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

We respectfully request that the proposed code change to 150.2(a) 1 not exclude additions due to misalignment of walls from old to new.

A flexible ICC exterior house wrap that can create resistance and R-value of R-1 under stucco and an R-4 under siding can be used without causing any deflection to the exterior walls or misalignment. With this we respectfully request that the code not be changed and that the R-value of continuous exterior warp be changed to R-1.

Submitted by,

Charlie Snowder

CC Payam Bozorgchami, P.E.
Associate Civil Engineer

LOW-E
SOUTHWEST DISTRIBUTION

DOCKET NO. 15-BSTD-01

March 26, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

The CEC is currently planning on changing Section 150.2(b)1Hlg from the current R-4 above deck insulation to R-2 above deck in the 2015 Energy Code.

We are requesting that this be a change to R-1 above deck based on the attached information provided by Mr. Ken Nittler, P.E. with Enercomp, Inc. This data demonstrates that an R-1 above deck insulation out performs "cool roof" requirements in California Zones 10-15 and therefore we are asking that this be placed on the current docket under the 45-day review period.

Thank you for the opportunity to provide our input on the proposed code changes. Please do not hesitate to contact our office if you have any comments or questions.

Sincerely,

C Snowder

Charlie Snowder
LEED AP

CC: Payam Bozorgchami, P.E.
Associate Civil Engineer

LOW-E
SOUTHWEST DISTRIBUTION

DOCKET NO. 15-BSTD-01

March 30, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

As a small business providing products that align with the California Energy Commission code changes for 2015, we propose that the Commission move forward with the requirement of installing high performance continuous insulation to the interior of the exterior walls in both residential and commercial construction.

A flexible continuous insulation can provide increased R-values to the wall assemble, create a thermal break to the interior from the wall system, create an air and vapor barrier and work in conjunction with standard system – which is in direct alignment with the proposed for the 2015 Energy Codes.

Thank you for your consideration.

Sincerely,

C Snowder

Charlie Snowder
LEED AP

CC Payam Bozorgchami, P.E.
Associate Civil Engineer

LOW-E®
SOUTHWEST DISTRIBUTION

DOCKET NO. 15-BSTD-01

March 30, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

We ask that JA4.1.2.2 Accounting for Continuous Insulation R-Value be changed to "This adjustment may not be used, however, for continuous insulation with thermal resistance less than R-2" be changed to read "with thermal resistance less then R-1". This is due to the value of R-1.

Respectfully submitted,

C Snowder

Charlie Snowder

CC Payam Bozorgchami, P.E.
Associate Civil Engineer