Pac-West
PROPERTIES, LLC

California Energy Commission
DOCKETED
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January 29, 2015

To: Commissioner Andrew McAllister
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Docket: 14-BSTD-01

From: Daniel Lloyd, Pac-West Properties, LLC.

RE: Draft 2016 Building Energy Efficiency Standards

Dear Commissioner McAllister:

My company, located in the Central Coast region of the State, builds less than twenty homes a year in the area. We were established in 2005 and concentrate our efforts in San Luis Obispo County. As any good business owner, we follow the development of building codes through our affiliation with the California Building Industry Association (CBIA).

We have been informed that comments by JCEEP into the 2016 Building Energy Efficiency Standards propose to severely limit the use of flexible ducts in new residential construction. We strongly object to the flex duct limiting proposal by JCEEP. All of the homes that Pac-West builds use flex duct for our HVAC systems. In addition, our HVAC systems are tested by the HVAC subcontractor and a HERS rater to verify their performance.

Over the past numerous regulatory cycles the duct tightness and performance of HVAC systems have vastly improved. Any suggestion to limit flexible ducts which are an integral portion of a well-designed and field verified HVAC system is not acceptable to the building industry.

Pac-West Properties Strongly opposes any reduction in the use of flexible duct for many reasons, and we urge you to oppose this limitation on our construction options for HVAC systems in our new homes.

Sincerely,

Daniel R. Lloyd
Manager

cc: Rob Oglesby, CEC Executive Director
Dave Ashuckian, CEC Deputy Director of the Efficiency & Renewable Energy Division
Patrick Saxton, CEC Advisor to Commissioner McAllister
Mazi Shirakh, CEC lead staff for 2016 Standards
Robert Raymer, CBIA Technical Director

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