
From:
Sent: Tuesday, June 07, 2016 11:56 PM
To:
Cc:
Subject: FW: Comments on the draft 9th Edition Code chapter 13 Energy Efficiency

Another comment on the Energy Code, although it is for the 9th, it is still relevant.

Sent: Friday, March 25, 2016 5:25 PM

Subject: Comments on the draft 9th Edition Code chapter 13 Energy Efficiency

Please confirm receipt of this email.

Per the information on the web page: <http://www.mass.gov/eopss/consumer-prot-and-bus-lic/license-type/buildings/updates-to-draft-9th-edition-of-the-building-code.html>

I am commenting on the draft of the 9th Edition Code (780CMR), specifically chapter 13 Energy Efficiency. <http://www.mass.gov/eopss/docs/dps/buildingcode/inf4/bbrs2016-01-15-basecodepublic-comment.pdf>

I have the following comments:

1. On page 83 the revision to C405.1 is confusing. The revision appears to be the addition of the requirement to comply with R404.2 to the Exception. The exception reads:

Exception: Dwelling units within commercial buildings shall not be required to comply with Sections 405.2 through 405.5, provided that they comply with Sections R404.1 **and R404.2.**

The problem is that I can't find a Section R404.2 in the code or in IECC-2015.

2. On page 206 (appendix AA "stretch code") in AA103.2, the reference to ANSI/ASHRAE/IES 90.1 should be clear that it is referring to the 2013 version of this standard. Suggested correction is underlined below:

AA103.2 Large area and high energy use buildings. All buildings over 100,000 sq ft, and new supermarkets, laboratories and conditioned warehouses over 40,000 sq. ft. shall comply with 780 CMR 13 and shall demonstrate energy use per square foot at least 10% below the energy requirements of ANSI/ASHRAE/IES Standard 90.1-2013, APPENDIX G Performance Rating Method on either a site or source energy basis

Thank you for your consideration of these comments. Please let me know if you need any further information.

Regards,

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