**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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*BER Comment : This penalty system doesn’t make sense, an entire wall should not be taking a penalty for a small section that isn’t properly installed. The idea behind modeling is to simulate what is actually built by final, and following this penalty makes for a model that doesn’t reflect on site details accurately. It seems the intention is to incentivize being more consistent with “Properly Installed” guidelines, but in doing so may jeopardize program and code compliance. There are no % thresholds described as there are with Grade 1/2/3, so interpretation of NPI/PI is going to become ambiguous.*

**Proposed Change to the Draft Standard\***  
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**4.2.2.3.2.2** ~~Insulated surfaces categorized as “Grade II” shall be modeled such that there is no insulation R-Value for 2 percent of the insulated surface area and its measured or labeled value, including other adjustments,~~~~2~~ ~~for the remainder of the insulated surface area (not including framing or other structural materials).~~ Insulated surfaces categorized as ~~“Grade III”~~ Not Properly Installed shall be modeled with the Assessed R-value that is determined in accordance with Appendix A for 90% of the insulated surface area ~~and such that there is~~ no insulation R-Value for ~~5~~ 10 percent of the insulated surface area.,3 ~~and its measured or labeled value, including other adjustments,~~~~3~~ ~~for the remainder of the insulated surface~~ area (not including framing or other structural materials).

Areas of an assembly shall not be modeled separately solely based upon insulation grading.  Where an insulated surface is categorized as Not Properly Installed, all insulated surface area with the same Assessed R-value, orientation, floor level, and insulation material shall be categorized as Not Properly Installed.