**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
We support Mr. Philip Fairey’s technical objection on this section and concur with his proposed change. A current Grade 3 designation with a 5% penalty is sufficient. Increasing it to a 10% penalty for a “Not Properly Installed” designation is excessive and there does not appear to be sufficient explanation for the increased penalty.

**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,~~~~[[1]](#footnote-1)~~ ~~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~~ 5 percent of the insulated surface area~~.~~,3 ~~and its measured or labeled value, including other adjustments,~~~~[[2]](#footnote-2)~~ ~~for the remainder of the insulated surface~~ area (not including framing or other structural materials).

1. (Informative Note) Such as compression and cavity fill versus continuous.

3 (Normative Note) The Assessed R-value shall include the installed insulation only and shall not include framing or other structural materials. [↑](#footnote-ref-1)
2. ~~(Informative Note) Such as compression and cavity fill versus continuous.~~ [↑](#footnote-ref-2)