**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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Insulations are often measured and sold in R-value per inch of product. Measuring the insulation to a ±R2 is a significant loss in energy efficiency, costly to the operator in heating and cooling costs, and an increase in operational carbon – the exact opposite of what this document is trying to achieve a reduction of carbon emissions.

Per 2018 IECC-C, Climate Zone 4A, a steel stud building designed with R7.5ci exterior continuous insulation, R15 interior cavity insulation to meet or exceed the prescriptive requirements and resulting in an assembly U-factor of U0.062.

If the “allowable per this document” installed insulation is only R5.5ci and R13 cavity, the resulting U-factor would only be U0.073. For this example assembly, that is almost a 15% drop in thermal energy efficiency and an increase in operational carbon.

Insulation is required to be labeled when shipped, usually at the bundle level. This information should be available to the Certified Rater during verification. Therefore, the R-value should only be allowed to be off by -R0.25.

**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”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Table 10.3.1 Verification Requirements for Confirmed Assessments

|  |  |  |
| --- | --- | --- |
| Insulation | Measure the dimensions including thickness of all insulated areas and verify dimensions match the *construction documents* to the nearest foot, fully fill the cavity or cover the surface, ~~and~~ R-values are ~~to within R-2~~ not less than R0.25 of design values, and installed per the manufacturer’s instructions.Determine and record all unique insulation types, brands, specific product name, and product name specific R-values at the measured thickness and compare with *construction documents*. | Record of visual confirmation or photographs of each insulation type and brand, specific product name, and/or brand verification by receipts or other accepted documentation.  |