**Comment #41**

**Page Number:** 1-25
**Paragraph / Figure / Table / Note:** 4.2.2.2.2
**Comment Intent:** Objection
**Comment Type:** General

**Comment:**

This comment is being issued on behalf of the Standards Committee of the North East Home Energy Rating Alliance, which represents more than 175 Raters and 9 Providers from New Jersey to Maine.

We propose that Addendum E-202x be stricken in its entirety.  These changes would not improve the issue of subjectivity in the grading of insulation and would create undue burden on stakeholders throughout the industry, including but not limited to Raters, RFIs, QADs, and software development.  It would also create a ripple effect throughout programs that reference the ANSI 301 standard, such as ENERGY STAR.  Further, we are concerned about the confusion that would be created in regards to the transition between the existing grading standard and this proposed change.

**Proposed Change:**

***~~Modify Section 4.2.2.2.2. as follows:~~***

**~~4.2.2.2.2. Insulation Assessment~~**~~:  Properly Installed insulation as defined in Appendix A, (Inspection procedures for Insulation Type and Proper Insulation installation (PII)), Insulated surfaces categorized as “Grade I” shall be modeled such that the insulation R-Value is considered at its measured (for loose fill, spray foam, etc.), or labeled (when an R-value mark is provided by the manufacturer), or installer certified value, including other adjustments,~~~~[[1]](https://www1.resnet.us/comments/comments.aspx?DocumentID=62&layout=1" \l "_ftn1" \o ") as described in Appendix A.for the insulated surface area (not including framing or other structural materials which shall be accounted for separately). 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]](https://www1.resnet.us/comments/comments.aspx?DocumentID=62&layout=1" \l "_ftn2" \o ") for the remainder of the insulated surface area (not including framing or other structural materials). Installed insulation that is deemed to not be properly installed (NPI) in accordance with Appendix A Insulated surfaces categorized as “Grade III” shall be modeled such that there is no insulation R-Value for 105 percent of the insulated surface area and its measured or labeled value, including other adjustments as described in Appendix A. ,~~~~[[3]](https://www1.resnet.us/comments/comments.aspx?DocumentID=62&layout=1" \l "_ftn3" \o ") for the remainder of the insulated surface area (not including framing or other structural materials). Other building materials, including framing, sheathing and air films, shall be assigned aged or settled values according to ASHRAE~~ *~~Handbook of Fundamentals~~*~~.  In addition, the following accepted conventions shall be used in modeling Rated Home insulation enclosures~~

~~(a)  Insulation that does not cover framing members shall not be modeled as if it covers the framing. Insulated surfaces that have continuous insulation, including rigid foam, fibrous batt, loose fill, sprayed insulation or insulated siding, covering the framing members shall be assessed and modeled according to Section 4.2.2.2 and combined with the cavity insulation, framing and other materials to determine the overall assembly R-Value.~~

~~(b)  The base R-Value of fibrous batt insulation that is compressed to less than its full rated thickness in a completely enclosed cavity shall be assessed as described in Appendix A.according to the manufacturer’s documentation. In the absence of such documentation, use R-Value correction factor (CF) for Compressed Batt or Blanket from ACCA Manual J, 8th edition, Appendix 4.~~

~~(c)  Areas of an assembly having different insulation types or R-Values (including uninsulated areas in excess of 5 percent of any otherwise insulated building component) shall be modeled separately with the applicable R-Values and assembly areas associated with each different insulation situation.~~

~~(d)  The overall thermal properties of steel-framed walls, ceilings and floors shall be calculated in accordance with the modified zone method specified by Chapter 27, ASHRAE~~ *~~Handbook of Fundamentals~~* ~~or tested in accordance with ASTM Standard C1363. Modification of test results to add or subtract R-Values to the tested assembly that reflect differences between the tested assembly and proposed assemblies is authorized when such differences are continuous and occur outside of the cavity.~~