

Decision No. 92554 DEC 30 1980

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Investigation on the Commission's own motion into the establishing by regulation or order necessary or desirable requirements to implement the HOME INSULATION ASSISTANCE & FINANCING PROVISIONS of newly enacted Public Utilities Code Sections 2781 through 2788, inclusive, as they apply to electrical corporations and gas corporations under the jurisdiction of the Commission.

Case No. 10032  
(Filed January 13, 1976;  
amended February 15, 1977)

(See Decisions Nos. 88551, 88928,  
and 90308 for appearances.)

INTERIM ORDER MODIFYING DECISION NO. 88551

Decision No. 88551 dated March 7, 1978 in Case No. 10032, among other things, established interim insulation material standards in Ordering Paragraph 4 as follows:

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"4. Until such <sup>time</sup> as insulation material standards adopted by the State Energy Resources Conservation and Development Commission, cellulose~~s~~ insulation materials must meet standards that equal or exceed the interim insulation material standards set forth in Appendix C to qualify for loans or hardware incentives under this order."

During the past two and one-half years these interim standards have been respected by the insulation manufacturers and contractors doing business in cooperation with the California energy utilities. During the same period, the United States Consumer Product Safety Commission and the Federal Trade Commission have been

actively pursuing the development of nationwide standards for cellulosic insulation materials. As a result of this work, on September 29, 1980 the Federal Trade Commission Home Insulation Rule (16 CFR 460) became effective (45 FR 54702). That rule, among other things, requires cellulosic insulation materials to meet or exceed Federal Specification (GSA) HH-I-515D. This specification basically limits the type of chemicals that can be used as fire retardants in the manufacture of cellulosic insulation material and established a new method for determination of settled density and "R" value (thermal resistance level) for cellulose materials.

The new rule prohibits the use of cellulosic insulation material which only meets the previously effective Federal Specification (GSA)-HH-I-515C. The new rule also required manufacturers of cellulosic insulation to increase the recommendation weight to achieve given "R" values through the newly adopted test for settled density.

On October 17, 1980, the Federal Trade Commission (Bureau of Consumer Protection) stayed Subpart 460.6 of the new Home Insulation Rule (16 CFR 460) dealing with the method of determining settled density of cellulosic insulation.

Because of the confusion caused by the various actions of the federal government, two letters and numerous oral requests have been received by the Commission staff to modify or clarify Appendix C of Decision No. 88551 to assure that proper materials are used in connection with any utility-sponsored home insulation activity.

The staff of the Energy Conservation Branch recommends that for proper material conformance to current federal specifications the following text changes be made in Appendix C to Decision No. 88551 dated March 7, 1978 as follows:

1. Delete reference to Federal Specification No. (GSA) HH-I-515C and replace with (GSA) HH-I-515D. The footnote mentioning Federal

Specification (GSA) HH-I-515D amendments should also be deleted since this is now a required specification.

2. The following paragraph should be added last under the subject heading "Thermal Resistance of Cellulose Materials":

Where the manufacturer's bag label requires a greater amount of material by either thickness in inches or by weight in pounds to achieve the same "R" value (thermal resistance level) and coverage than is set forth above, the manufacturer's bag label requirements shall be followed when installing the material.

3. The interim list of cellulose materials manufacturers should be revised to include the names of manufacturers (products) which to our knowledge meet the current Federal cellulose materials standards.

#### Findings of Fact

1. The Federal Trade Commission on September 29, 1980 adopted Home Insulation Rule (16 CFR Part 460) requiring cellulose materials manufacturers and insulation contractors to make and use only cellulosic insulation materials which meet or exceed Federal Specification No. (GSA) HH-I-515D.

2. The Federal Trade Commission on October 17, 1980 stayed Subpart 460.6 of Home Insulation Rule (16 CFR Part 460) adopted September 29, 1980, thus allowing the previously authorized two alternative test methods for determining settled density and "R" value (thermal resistance level) of cellulose insulation.

#### Conclusions of Law

1. All insulation materials used in insulation programs sponsored and/or coordinated by the California energy utilities should conform to the current requirements set forth in federal law.

2. To eliminate any ambiguity and possible resulting liability, the California investor-owned energy utilities, when using or recommending the use of cellulose materials, shall use and/or recommend only those materials meeting the current federal requirements.

3. This order should be effective on the date of signing to bring our Appendix <sup>1c</sup> of Decision No. 88551 into conformance with changed federal standards for cellulosic insulation materials. m

IT IS ORDERED that:

1. Until such time as insulation materials standards are adopted by the State Energy Resources Conservation and Development Commission, cellulosic insulation materials must meet standards that equal or exceed the interim insulation material standards set forth in Appendix A to qualify for loans or hardware incentives under this order.

2. In all other respects, Decision No. 88551 shall remain in full force and effect except as otherwise modified by Decisions Nos. 88928 and 90308.

The effective date of this order is the date hereof.

Dated DEC 30 1980, at San Francisco, California.

John E. Boyson  
President

Richard W. Gravel

Richard T. Pedersen

Thomas J. Quinn  
Commissioners

Commissioner Vernon L. Sturgeon, being necessarily absent, did not participate in the disposition of this proceeding.

## APPENDIX A

INTERIM STANDARDS FOR INSULATION MATERIALSFire Safety, Corrosion, and Moisture Absorptivity

Cellulosic materials shall equal or exceed Federal Specifications HH-I-515D and in addition shall be tested by the Underwriters Laboratories (UL) under their continuous UL "Follow-Up Service" procedure. The material shall be labeled, marked, or have other identifying evidence of certification on each bundle, bag, carton, or barrel.

Thermal Resistance of Cellulosic Material

The thermal resistance (R-level) of cellulosic material shall be limited to an R-level of 3.7 per inch for determining the total R-level of attic insulation. As an example, 5-1/8 inches would be the minimum acceptable thickness for cellulosic attic insulation to qualify at the R-19 thermal resistance level.

To assure proper coverage for cellulosic material at least one forty (40) pound bag should be used for each 50 square feet of gross attic area or a minimum of twenty forty (40) pound bags should be used for an attic with a gross area of 1,000 square feet.

Where the manufacturer's bag label requires a greater amount of material by either thickness in inches or by weight in pounds to achieve the same R-value (thermal resistance level) and coverage than is set forth above, the manufacturer's bag label shall be followed when installing the material.

Partial List of Materials that Meet Interim Standards

The following is a partial list of insulation materials by brand name which meets the interim standards set forth in this Appendix. It should be emphasized that this list does not contain the names of all insulation materials that meet the interim standards. Other names may be added upon verification by the utilities of meeting these standards.

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## APPENDIX A

Fiberglass and Rockwool Materials

1. Certain-Teed
2. Certain-Teed Saint Gobain (CSG)
3. Johns-Manville
4. Owens-Corning Fiberglas
5. Rockwool, Premium brand

Cellulosic Materials

- |                                  |  |
|----------------------------------|--|
| 1. All-Seasons                   | 9. Therma-Cooustic Manufacturing Corporation |
| 2. Crown Insulation              | a. Cordex                                    |
| 3. Energy Guard                  | b. TR +                                      |
| 4. Everguard                     |  |
| 5. Fibercel                      | 10. Thermal-Guard                            |
| 6. Golden-Therm                  | a. Thermolite                                |
| 7. Mono-Therm Industries         | b. Super-Therm                               |
| a. Cellular - 19                 | 11. Unitemp                                  |
| b. Mono-Therm                    | 12. Western Community Industries             |
| 8. Superior Products Corporation | Save-Therm                                   |
| Fibertherm - 140                 | 13. Western Weathercheck                     |

Insulation material standards, upon their issuance by the California Energy Resources Conservation and Development Commission, shall supersede the above interim standards.