



27 May 2003

Bill Pennington
Project Manager
Energy Efficiency and Demand Analysis Division
California Energy Commission
1516 Ninth Street, MS-28
Sacramento, CA 95814

sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 149(b) 1.B (original and the draft provided by Virginia Lew on 20 May 03)

Dear Mr. Pennington:

Comment

This subsection is overly complex; it should be simplified to read:

“B. For low slope roofs, a permitted removal and replacement of more than 50% of the roof surface or 2,000 square feet, whichever is less, shall be deemed to be an alteration for purposes of this Section.”

Rationale

All of the detail in this subsection in essence simply repeats, in a round-about way, the requirements of subsection 149 (a) above it; the only additional information is the definition of what degree of roof removal constitutes an “alteration” so as to bring the activity under the control of Section 149.

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer
Director, Legal & Technical Affairs
Henry Company

