



May 19, 2006

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Comments on Commercial and Residential Low Slope Roofs Discussion.

I was pleased with the hearings, and the presentations given. I was primed to speak several times, but then others said a lot of what I would have said. As far as Akbari's presentations, the use of aged values with a way for a producer to introduce product into the market with a de-rated value until it has been fully aged and tested by CRRC is a great way to move forward and make the three-year rating valuable. I have not reviewed the math enough to know if the de-rating is fair and adequate, but it is at least close and a good way to start.

I do object to the use of the SOLAR REFLECTIVE INDEX in any form. Although it is an interesting concept, it has not been adequately documented that it provides the energy savings, which are achieved with reflectance and emissivity. It also appears to be much more subject to manipulation than the basic limitations based on emissivity and reflectance hard data.

My verbal comments were:

SPRI has been present in the hearings on the 18th & 19th. Some points of discussion need to be reviewed, and some honest information presented.

1. We recommend that if the CEC revises the insulation requirements, that the economic justification for cool roofs be re-evaluated.
2. Several discussions on costs have occurred. With low slope roofs there are "no cost" options. These options may replace some existing products in the CA market with other products for the same or less installed costs. Many of the current non-sheet membrane products are replaced every 10 years or more frequently. These roofing systems with short lives, cost as much, or nearly as much as sheet membrane systems complying with the prescriptive requirements of title 24 that are likely to last 15 to 30years.
3. A large loophole exists in the 2005 version of Ttitle 24, based on current interpretation, it allows re-roofing without increasing the roof insulation to the present code required level for new construction. This interpretation misses a great opportunity for increasing the insulation and creating savings in heating and cooling energy.
4. SPRI and DOE have funded the research that verifies that ballasted systems provide equal energy savings as reflective cool roofs. Although they do not prescriptively meet

the requirements, the systems meet the goals of the program and we would like to continue to work with you to provide an option to use this energy efficient solution.

5. SPRI members that manufacture sheet membranes have responded to Title 24 roofing prescriptive requirements by increasing capacity and having product available that meets the prescriptive requirements at very competitive costs.

Thanks for giving me this opportunity to present our point of view.

SPRI

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David L. Roodvoets

SPRI Technical Director.