Our Third Generation

ACME
ROOFING COMPANY

June 21, 2007

Chris Gekas
California Energy Commission
1516 Ninth Street, MS 25
Sacramento, CA 95814-5512

Re: Draft Sections 149 (b) 1 B iv and 149 (b) 1 B v of the 2008 Building Energy Efficiency Standards: **OPPOSE**

Dear Mr. Gekas:

As an experienced, professional roofing contractor, I am writing today to register my strong objection to the above-referenced provisions of the draft 2008 Building Energy Efficiency Standards. If adopted, they will not result in more energy efficient roofing. They will actually encourage further noncompliance.

Draft Sections 149 (b) 1 B iv and 149 (b) 1 B v propose to establish new above-the-roof-deck insulation requirements for low-slope reroofing operations. There are three main problems with these draft proposals:

1. In many cases, it is simply not feasible to add significant amounts of insulation above the roof deck without running afoul of conflicting building codes and zoning ordinances that limit the height of buildings.
2. Where it is possible to raise the level of an existing roof, the cost of relocating or replacing drains and vents, removing and reinstalling skylights and HVAC units, raising equipment curbs, etc. can be monumental and far exceed any energy savings to be realized by installing the additional insulation.
3. Under the current Energy Code, building owners have viable reroofing options. They can choose to have a compliant "cool roof" installed or they can opt instead to have a non-compliant roof installed along with additional insulation. Establishing an R-8 or R-14 baseline rooftop insulation requirement, however, forecloses building owners' reroofing options by making it extremely difficult or impossible to consider trade-offs.

Draft Sections 149 (b) 1 B iv and 149 (b) 1 B v create baseline roof insulation requirements that either cannot be complied with at all or are so costly and/or unappealing as to encourage building owners and roofing contractors to ignore them. For these reasons, **I urge the California Energy Commission to delete these provisions from the proposed 2008 Building Energy Efficiency Standards.**

Thank you for your attention and consideration.

Sincerely,

John Dissmeyer

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