

# ALEX ENGARDT ROOFING AND SIDING CO.

*Roofing - Siding - Insulation*  
*All Types of Repairs*

STATE CONTRACTORS LICENSE NUMBER 241602

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June 22, 2007

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

In re: 2008 Building Energy Efficiency Standards  
Sections 149 (b) 1 B iv and  
149 (b) 1 B v

Dear Mr. Gekas,

I have been a roofing contractor for over 50 years and must Oppose these draft Provisions. It is obvious that the provisions are impossible to meet.

Some conflicts with Manufacturers specifications are being overlooked. Just in the length of nails causes impossible requirements to meet codes, etc.

Many building owners are refusing to go along with the present requirements because of the excessive costs over standard roofing and shop around until they find someone who either does not know the regulations or doesn't care, so long as they get the job. Then the work is done without a permit and everyone loses.

Besides the cost of the excessive insulation, thousands of dollars will be needed to correct drain, skylight, air-conditioning flashings and related electrical, gas and condensate lines and all related items.

The above roof deck requirements are wrong and will not do what they think it will.

Please ask the Energy Commission to remove these provisions that do not make any sense. In theory is one thing, but the facts are completely opposite of the intentions.

Thank you for your assistance.

Sincerely,

  
HAROLD J. MULLIN

HJM:d1