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June 8, 2007

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

Attention: Bill Pennington (e-mail: bpenning@energy.state.ca.us)

Re: Low Slope Roofing Costs

Dear Mr. Pennington,

Recently, we reviewed a letter and report done for the Asphalt Roofing Manufacturers Association by Pacific Building Consultants, Inc. dated May 19, 2007. The "snap shot" report concludes with a summary of the ranges of roof system costs and cost premiums by system type and location. The report is based on a very small sampling of cost estimates from a small number of contractors suggesting there was little if any statistical basis for the report.

As we reviewed the data, inconsistencies with what we have experienced over the years immediately came to light. In order to collect supporting data we solicited information from several of our California representatives and contractors. However, with the short time frame, providing more definitive information from a representative group prior to the June 13th meeting has proved to be a challenge.

According to personnel involved with estimating and bidding roofs in Southern California, the installed cost for our "cool" single-ply is virtually the same as for "non-cool" BUR. It was stated that "no place in Southern California is a BUR considerably cheaper than our system." The average of +/- $2.60 per square foot installed is well within the said study's "cost range" for BUR. (It should be noted that the parameters set by the study are rather simplistic compared to real world experiences. In every roof installation there are numerous objectives besides cost that impact the selection of the most appropriate system.)

Personnel from Northern California provided installed cost estimates ranging from $1.50 to $3.00 per square foot. It was pointed out that "with increasing material and labor costs the gap between single-ply and BUR was almost nothing." Again, the complexities of such site considerations as tear-off, insulation requirements, fire-rated materials, plus installer concerns for safety of workers and accidents with hot tar, have significant impacts on costs yet were not considered with the study.

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The CEC, after significant study and deliberation, developed Title 24 to address the need to control energy consumption in California, particularly during critical summertime peak demand periods. Cool roofing and its benefits for mitigating urban heat islands and reducing energy usage have been studied in depth by entities such as Lawrence Berkeley National Laboratories, Oak Ridge National Laboratories and NASA. It has been found conclusively that cool roofing is very effective at helping accomplish these goals. Since there has been no widespread backlash from building owners claiming undue financial burden, it is apparent that the benefits achieved have led building owners to a recognize the added value provided by cool roofs.

Changing course based on a small unscientific sampling of data could lead the CEC to compromise a program that is making significant progress toward reducing energy consumption in California. Aside from losing the economic benefits and distribution capacity improvements, weakening the Title 24 cool roof requirements would also reduce positive environmental impacts such as heat island mitigation and pollution control. The CEC could avoid these potential losses by undertaking a more detailed analysis that fully assesses the strengths and weaknesses of the current code.

Please feel free to contact me if you have questions or need additional information.

Sincerely,

Drew Ballensky
Duro-Last Roofing, Inc.

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