

September 17, 2007

Subject: 2008 Building Energy Efficiency Standards Pre-45 Day Language
Comments Provided by the Cool Metal Roofing Coalition

Mr. Chris Gekas and Mr. Mazi Shirakh
California Energy Commission
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

Dear Messrs. Gekas and Shirakh,

The Cool Metal Roofing Coalition forwards the following comments for the pre-45 day language:

General Comment:

We urge the CEC to reformat the Title 24 so that it is easier to follow and reference sections. A simple edit that would replace the cumbersome combinations of numbers, lower case alpha, upper case alpha, numbered lists, and i, ii lists would be a huge improvement. Just identifying the sections to provide the comments below was a chore.

Section 118:

1. Section 118 (i) 2 – This equation is only good for cases where the required 3 year aged reflectance is 0.55, such as nonresidential low-slope or residential low-slope. For cases where the target 3 year aged reflectance is 0.20, etc., an appropriate equation needs to be provided (LBNL input required).

Section 143:

1. Section 143(a) 1 A ii – “high-slopped” should be “high-sloped” in two places, and we suggest using the more conventional term of “steep-sloped” which is used else where in the building codes.
2. Prescriptive requirements for low-rise residential new construction are nowhere to be found. They need to be added.
3. Section 143(b) 1 – A reference is made to Appendix 8, which we do not have. Is this a new Appendix? This is critical to our being able to evaluate the overall envelope approach, since it is entirely new.

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Section 152:

1. Section 152 (b) 1 H ii – We think the climate zones were intended to be the same for both of these subsections, i.e. zones 10 through 15, instead of this one being zones 1 through 16.
2. Section 152 (b) 1 H – Alternative to Sections 152 (b) 1 H i and ii - item a – We are not sure why the air-space is ½ inch since all of our supporting documentation on this has indicated a ¾ inch air-space required. Please provide us with the rationale from deviating from the ¾ inch requirement.
3. Section 152 (b) 1 H iii – The Exception should say Buildings with “no” ducts in the attic.
4. Section 152 (b) 2 D – The cross-referenced section should be Section 152 (b) 1 H, instead of G.

We hope the above comments are helpful. Please let us know if you have any questions.

Sincerely,



Gregory L. Crawford
Executive Director
Cool Metal Roofing Coalition