



October 3, 2007

Mr. Chris Gekas  
California Energy Commission  
Media and Public Communications Office  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

Re: Proposed Changes to CA Title 24 Addressing Roof Insulation Levels

Dear Mr. Gekas:

PIMA is the trade association for manufacturers of rigid polyiso foam insulation, a product that is used in over 60 percent of new commercial roof construction, in 30 percent of new residential construction that uses insulated sheathing, and in most re-insulation of existing commercial building roofs. PIMA members have a nationwide presence with 31 polyiso manufacturing facilities in 16 states and Canada and broad usage in your state. PIMA and its members are strong supporters of public policies that promote cost-effective improvements in the energy efficiency of buildings, and have been applauded by the USEPA for our positive efforts in this regard. In this time of increasing uncertainty in energy supply and increasing energy demand, **addressing the energy performance of the nation's existing building stock is more important than ever.**

With these facts in mind, we would like to commend the CEC for its desire to improve energy performance in California's existing buildings. However, we would like to share our concerns over the initial draft pre-45 day language for California Title 24, Subchapter 6, Section 149 regarding Additions, Alterations and Repairs to commercial buildings in California.

We believe that there is significant opportunity for energy saving and peak load reduction by improving the insulation levels of commercial roofs, and it is during re-roofing and roof repair when it is easiest for building owners to add more insulation.

Fortunately, the question of "what is the cost effective level of insulation?" is now being addressed by ASHRAE during the deliberations of new Standard 90.1. Addenda "AS" to Standard 90.1 is presently being revised to show an across-the-board increase in roof insulation levels for the first time since 1989. This proposed Standard will show R-20 continuous insulation as cost effective in all California climate zones.

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We are concerned that the insulating values proposed for California's commercial buildings are significantly below the cost-effective values that will be proposed by ASHRAE (R-8 and R-14 versus R-20).

We are also concerned that the proposed language suggests that if only half of the roof is being repaired, the insulation level does not need to be improved at all (Section 149, B). Again, there is never a better time to improve the overall energy performance of the roof than when these types of repairs are being made. We strongly urge that this exception to improving the roof insulating values be used only for "minor repairs" (i.e. less than 10% of the total roof area).

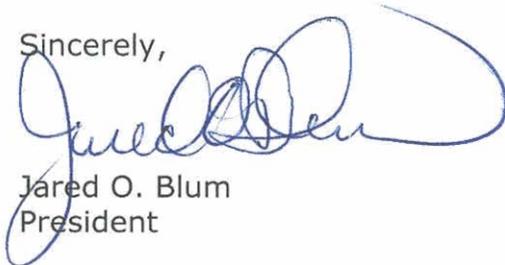
We applaud ASHRAE's recognition of the importance of commercial roof insulation to overall building energy performance – even when using national average values for the cost of energy. Should California's time-dependant valuation of energy and demand be used in the cost-effectiveness analysis, we would expect even higher levels of insulation to be cost effective.

We urge you to immediately embrace the new proposed ASHRAE values for all commercial roofs. We further urge you to seize the opportunity for improving the energy efficiency of all existing commercial buildings any time that their roofs are being significantly repaired, resurfaced or replaced.

Insulation provides proven, persistent energy and power savings. We encourage you to immediately raise all of the values in Table 149-A to AT LEAST the proposed ASHRAE minimums of R-20.

Thank you for your consideration of this request. We'd be happy to answer any questions you may have on the ASHRAE adopted values and their appropriateness for California.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jared O. Blum", with a large, sweeping flourish extending to the right.

Jared O. Blum  
President