DOCKET
12-BSTD-1
DATE MAY 25 2012
RECD MAY 25 2012

ASSOCIATED ROOFING CONTRACTORS OF THE BAY AREA COUNTIES, INC.
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May 25, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-BSTD-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Adoption of the 15-Day Language for the 2013 Building Energy Efficiency Standards, Section 140.3, Section 141.0(b)2B and Correction of Errata in Table 141.0-B - **SUPPORT**

Members of the California Energy Commission:

During the 45-Day Language Hearing that was held on March 12th, this Association expressed concerns about the several of the revisions to the Building Energy Efficiency Standards that pertain to roofing operations. Specifically, we objected to the lack of consistency between the "cool roof" reflectance and emittance standards for new construction v. additions and alterations to existing buildings; to proposed Table 141.0-A, which unduly limited the flexibility of roofing contractors to effectuate insulation-reflectance trade-offs both above and below the roof deck; and to the elimination of the Overall Envelope Energy Approach as a compliance option.

We are pleased to report that shortly after the March 12 hearing, CEC staff agreed to the setting of uniform reflectance and emittance standards. We were also advised that the Overall Envelope Energy Approach will be retained, although it will be relocated into the Nonresidential Alternative Calculation Method. In addition, staff committed to making a free, user-friendly overall envelope tradeoff methodology available on the CEC website. We welcome and support all of these initiatives.

When the 15-Day Language was released on May 15th it contained a new insulation-reflectance trade-off matrix, Table 141.0-B. The table was intended to address our concerns about affording roofing contractors the flexibility to make trade-offs below the roof deck, as well as above it, but in some situations this new tool produced anomalous results. Working with CEC staff and consultants, we have identified errata to Table 141.0-B, which when remedied will resolve these issues. We welcome and support these corrections.

At this point, our only remaining concern is that the relationship between Table 141.0-B and Table 141.0-C may not be clearly understood, especially by enforcement personnel. The minimum insulation requirements set forth in Table 141.0-C were taken into account when the maximum U-factors that are contained in Table 141.0-B were calculated. Hence, a roofing contractor who makes a trade-off pursuant to Table 141.0-B will at the very same time come into compliance with the minimum insulation requirements set forth in Table 141.0-C. A local Building Official who does not appreciate this fact may erroneously insist that the roofing contractor demonstrate separate compliance with both tables.

In order to avoid confusion and conflict, efforts need to be made to ensure that all concerned clearly understand that the minimum insulation requirement in Table 141.0-C is satisfied when a contractor makes a trade-off that complies with the requirements of Table 141.0-B. The CEC staff has graciously invited me to work with them to address the potential confusion, as well as to devise informative illustrations about how the new trade-off table works, when the 2013 Nonresidential Compliance Manual is written. I am happy to accept the invitation to participate and look forward to working with them on that project.

In consideration of the above revisions and understandings, we are pleased to express our support for the 2013 Building Energy Efficiency Standards as they pertain to the roofing industry.

Thank you for your attention, consideration and responsiveness to our concerns.

Sincerely,

William D. Callahan, Ph.D.
Executive Director