KARNAK CORPORATION
THE SEAL OF QUALITY

June 3, 2005

State of California
California Energy Commission
Attn: Ms. Elaine T. Hebert
1516 Ninth Street, MS 25
Sacramento, CA 95814-5504

Dear Elaine:

Thank you for allowing us the opportunity to submit our comments on the proposed changes to Title 24 Section 118-C. Generating a policy of this nature is an enormous task with far reaching consequences. It requires careful thought and deliberation to eliminate the possibility that an omission could hurt consumers, businesses and the economy, rather than generating the benefits it has the potential to generate if carefully crafted.

California is a leader in Energy Code and Environmental Improvement initiatives. Many states emulate initiatives that are started in California such as is the case with VOC regulations and Energy Efficiency initiatives. However, with leadership comes responsibility. Please forgive my reiteration of something that I know is obvious to you already. Since Title 24 may, and will most likely be emulated, the members of this Commission have a duty to listen carefully to input from all parties and evaluate the far reaching consequences of the policy. This will result in protecting the interests of the consumer by retaining the widest array of product choices possible, while complying with the mandate of Reducing Energy Consumption.

While the proposed changes to Table 118-C expand the options of products available to the consumer somewhat, it still eliminates roughly 80% of the field tested, Fire Rated, Factory Mutual Rated, proven products that can comply with the reflectivity and emissivity requirements.

On behalf of Karnak I respectfully offer the following comments and suggestions.

The regulation as it stands can hurt the consumer by:

a. Limiting the product options available, thus increasing product and potentially labor costs.

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b. Reducing the potential life expectancy or sustainability of the roofs by limiting the availability of products that may have longer life expectancies and lower costs while offering the energy efficiency attributes required by the code.
c. Forcing the unnecessary replacement of existing roofs that may require Class "A" fire ratings to retain their warranty or insurance. This will result in a greater waste stream and additional fuel consumption to dispose of the waste.
d. Forces consumers to use a product with "Fixed Attributes" despite the fact that the energy calculators show that in some geographies products with different attributes than those required by the current or proposed code would offer greater energy savings.
e. Limiting the coatings options has a negative synergistic effect on the available roofing systems that can comply with building codes. Some building codes require Class "A" fire ratings which are "System Specific". This means that elminating a single coating that is the only means of obtaining a Class "A" approval with a variety of roofing membranes, in effect bans the membranes as well.
f. Businesses will suffer economically as a result of being forced to use a very narrow set of options to maintain their roofs.
g. Under the current or proposed code change, the product options available may limit the ability of roofs to be re-roofed or re-coated without preparation.
h. The regulations effectively ban proven products which could otherwise be used to achieve the desired energy savings if the whole building performance method were employed.

Thank you for your time and consideration.

Sincerely,

Chris Salazar – Vice President Sales & Marketing
Karnak Corporation