



RCMA Low Slope Public Testimony

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The Roof Coatings Manufacturers Association (RCMA) appreciates the opportunity to comment on the proposed changes to California Title 24. RCMA is the national trade association representing the manufacturers of bituminous and non-bituminous roof coatings and the suppliers to the roof coatings industry.

RCMA formally restates our position that the CEC should not change the current 0.55 solar reflectance in this code cycle. Our industry maintains this position because the baseline costs used for cost justification continue to not be representative of the real world costs associated with cool roofing materials.

The proposed increases for 2013 continue to endorse this flawed data since the justifications for the proposed increases of 0.63 for alternations and 0.65 for new roofing are founded by comparison against the existing requirement of 0.55 aged solar reflectance.

The cost analysis conducted by AEC is seriously flawed for four main reasons. First, the response pool upon which the proposed code is based is far too small to draw any conclusion. Second, there are not enough data points to show a range of costs for each roofing material category. Third, there is a clear issue with the labor costs when union labor rates come in at \$2.25/hour less than open shop rates. Fourth, there appears to have been no attempt to confirm that respondents were basing their feedback on the 0.65 target as requested.

The AEC supposed "cost analysis" contains very little real cost data and what little has been generated demonstrates no proof of its accuracy. CEC is making existing standards more stringent without going through a complete and thoughtful analysis. RCMA recommends that the CEC skip this code cycle so you can take your time formulating a better, simpler rule.

The direction the CEC is currently taking is dictated more by "peak energy reduction" which benefits mainly energy companies and a small segment of consumers, rather than by a desire to actually reduce energy consumption altogether. There is a clear difference between "peak savings" and overall "energy savings." Peak energy savings means a reduction in energy use when energy companies are nearing their maximum production capacity. Energy savings, on the other hand, means the reduction in total energy consumption to heat or cool the building year-round.

RCMA reiterates our offer to work together with the CEC to collect real world data which can be used to develop a robust, statistically significant cost justification analysis document that can be used to set fair, reasonable, and sound solar reflectance requirements for non-residential roofs in California. Once again, we appreciate the opportunity to comment on the proposed changes.