

# Sika Sarnafil

World Class Roofing and Waterproofing

SENT BY E-MAIL TO: [Pbozorgc@energy.ca.gov](mailto:Pbozorgc@energy.ca.gov), and by USPS

May 8, 2012

California Energy Commission  
Dockets Office  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Attention: Payam Bozorgchami, P.E., Associate Civil Engineer

## Re: Title 24, 2013 proposed 15 Day Roofing

Dear Mr. Bozorgchami

We are writing to you in response to your request to our Mr. J. Calkins for our opinion on the prescriptive requirements for cool roofs being proposed in the "15 day language".

We have been very active providing input directly, and indirectly through the roofing industry coalition, to the changes being proposed for the 2013 edition of Title 24. We have testified at each of the public hearings and written to the Commission on numerous occasions<sup>1</sup>. We have stated time and again that we are opposed to any changes due to:

- the lack of any concrete evidence supporting the need for the changes,
- the failure to demonstrate any appreciable benefit, either environmental or economic, that would result from the proposed changes,
- the significant market disruption that would result,
- the short time frame to implementation.

We proposed phased increases in aged reflectivity values that would have allowed the CEC to achieve their goals, albeit over a slightly longer time frame. Our proposal would however have provided manufacturers the time required to adapt their products without sacrificing durability and other performance attributes, and minimized market disruption. We genuinely believe the interests of all parties: consumers, the CEC, and the industry at large would have benefited greatly adopting our proposals for phased increases.

Although we do appreciate that the CEC has moved from some elements of their original proposals, we feel the current language remains problematic for many of the reasons noted previously. One noteworthy issue with the current proposal is the penalty imposed upon products relying upon the Solar Reflective Index to meet the proposed prescriptive requirements.

On February 2, 2012 we wrote to Mr. Shirakh, requesting clarification that "the prescriptive requirements will allow for materials that meet both the reflectivity and emittance requirements, or the equivalent SRI". We never received a response.

<sup>1</sup> July 18, 2011; August 15, 2011; October 12, 2011; March 12, 2012



**DOCKET**

**12-BSTD-1**

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After first seeing the proposed language, I expressed concern with the proposed SRI levels in an e-mail to yourself on April 3, 2012, and in a subsequent letter to Mr. Ware on April 12, 2012.

As I have previously noted, based on the draft that was recently circulated, the CEC is proposing in Section 140.3 (a) 1. A. i. a. that the prescriptive requirement for Roofing Products in this subsection be:

1. A minimum aged solar reflectance of 0.63 and a minimum thermal emittance of 0.75: or
2. A minimum SRI of 75.

A solar reflectance of 0.63 and an emittance of 0.75 yield an SRI of 72.

Apparently the proposed SRI of 75 is based on 0.63 and 0.85 values for reflectance and emittance respectively. The 0.85 was the original value considered by the CEC before it was agreed to reduce it to 0.75 as is currently proposed.

According to the text that accompanies the Solar Reflectance Index Calculator on the CEC's website<sup>2</sup>

*"The SRI alternative is useful when a particular product exceeds the Building Energy Efficiency Standards requirement for either the aged solar reflectance or the initial thermal emittance, but does not meet both requirements. In this case the combination of the aged solar reflectance and the initial thermal emittance for the product may be sufficient to comply with the SRI requirement".*

Having an SRI that is higher than that which is based on the minimums for the separate properties goes counter to the CEC's stated intended use of the SRI. Having an SRI that does not reflect the values agreed upon for the reflectance and emittance, essentially penalizes the SRI option and will no doubt lead to confusion in the implementation of the code.

We respectfully request that the CEC correct this value and insert an SRI of 72 as the alternative prescriptive requirement for cool roofs.

I would welcome the opportunity to discuss this matter with you at your convenience. I can be reached at (781) 332-3209.

Best regards  
Sika Sarnafil  
A Division of Sika Corporation

  
S.P. Graveline  
Vice President Technical Services

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<sup>2</sup>[http://www.energy.ca.gov/title24/2008standards/sri\\_calculator/](http://www.energy.ca.gov/title24/2008standards/sri_calculator/)



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