



**RCMA Comments on 15 day language – 2013
Building Energy Efficiency Standards California
Energy Commission Docket Number 12-BSTD-01**

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**Subject: RCMA Comments on 15 day language – 2013 Building Energy Efficiency Standards California
Energy Commission Docket Number 12-BSTD-01**

Dear Mr. Shirakh,

The Roof Coatings Manufacturers Association (RCMA) appreciates the opportunity to submit the following comments on the proposed changes to the 2013 California Building Energy Efficiency Standards. 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 would like to reiterate our position that the California Energy Commission (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 in the 2005 code, and again for 2008 were based on a Lawrence Berkeley National Lab report from 2002 that was not representative of the real world costs associated with cool roofing materials. Nor did this baseline data accurately reflect the premiums for “cool” versions of existing roofing materials. The current prescriptive requirement for low-slope roofing of 0.55 aged solar reflectance was based on that erroneous report.

Again, the proposed increases for 2013 continue to sustain and validate this flawed data since the justifications for the proposed increases of 0.63 and 0.65 for alterations and new roofing respectively are founded by comparison against the existing requirement of 0.55 aged solar reflectance.

As RCMA and many other organizations have stated, the cost analysis conducted by AEC is seriously flawed. First, the response pool upon which the proposed code is based is far too small to draw any sort of conclusion. There were only three written responses and nine phone interviews with no substantiation as to the validity of the data or the qualification of respondents to respond. Second, there are not enough data points to show a range of cost variability for each roofing material category. The survey clearly fails to pass any test for statistical significance. Third, there is undoubtedly an 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 validation of its accuracy. There is no way that a reputable organization can seriously draw any conclusions based on such an unsubstantiated and extremely limited response.

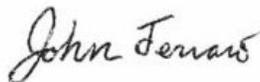
By not conducting this analysis in a proper, thoughtful, and responsible manner the CEC is regulating durable, proven, reliable products out of the market, taking choice out of the hands of Californians, and putting hundreds of manufacturing and contracting jobs at risk, all based on flawed data that cannot stand under scrutiny. CEC is making existing standards more stringent without going through a complete and thoughtful analysis that considers not only the economic basis for the changes. Consequently, the full picture of the science behind the arbitrary changes that are being proffered and the ripple effects they will create is not complete and very poor science at best.

As our organization verbally stated at the March 2012 public hearing, 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.

The approach taken by the CEC in the draft proposals for low-slope roofing, despite efforts to simplify, will create confusion in the marketplace. Whatever level of surface reflectance meets with the cost justification requirements should be consistent for new roofs and alterations. As has been proven in the past, variable requirements by location or application leads to uncertainty and perplexity in the marketplace and confusion for all involved in the process of selecting the proper roof system for the building.

RCMA reiterates our offer to work collaboratively 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 to the 2013 California Building Energy Efficiency Standards. Please do not hesitate to contact me if you have comments or questions on any of the above.

Sincerely,



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Cc: RCMA Board of Directors
Payam Bozorgchami, CEC