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ARMA Comments Regarding 2028 Code; Section Reference Corrections

Please see attached documents for suggested corrections to section references.

Additional submitted attachment is included below.

November 11, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

CEC Docket Number: 25-BSTD-03
Title: 2028 Energy Code Pre-Rulemaking
Re: ARMA's Suggested Revisions to the 2028 Energy Code Pre-Rulemaking

Dear Commissioners and Energy Code staff:

The Asphalt Roofing Manufacturers Associate (ARMA) appreciate the opportunity to provide feedback on the 2028 edition of Title 24, Part 6. Please see the attached suggested edits to correct section references. The comments use the October 12, 2026 Energy Code draft, TN 273088.

Specifical revisions including corrections to Table 102.5(1); updated references in sections 301.3.1.1, 302.3.7, 302.5.2.2.3, 303.3.1.1.1; and corrected references to section 300.3.7 in sections 303.5.2.2.1 and 301.5.2.2.3, before advancing the formal 2028 Energy Code proposal.

Thank you for your time and consideration of these comments. We welcome the opportunity to answer any questions or provide further clarification as needed.

Respectfully submitted,

Heather Estes
Vice President of Technical Services
Asphalt Roofing Manufacturers Association (ARMA)

Page ii (p. 123) Update

Referencing the updates provided on Page *ii*, it appears as though subsection 300.3 refers to Insulation, while subsection 300.4 refers to Roofing products, and subsection 300.5 refers to Radiant barrier.

Section 300 Mandatory Requirements for all occupancies

Subsection 300.1 Fenestration products and exterior doors

Subsection 300.2 Requirements to limit air leakage

Subsection 300.3 Insulation

Subsection 300.4 Roofing products

Subsection 300.5 Radiant barrier

ARMA's suggested reference updates refer to this nomenclature.

Item #1: Page 153: Section 101.2 [Section 110.0] **General**

Suggested edit: strike "*Roofing Products and Radiant Barriers"* and insert 300.4 and 300.5.

101.2 *[Section 110.0]* **General.**

The following sections specify requirements for manufacturing, construction and installation of certain systems, *equipment*, appliances and *building* components that are installed in *buildings* within the scope of Section 100.3 *[Section 100.0(a)]*.

101.3, 101.4 *[Section 110.1, 110.5]* Systems and Equipment

300.1 *[Section 110.6]* Mandatory Requirements for *Fenestration Products* and Exterior *Doors*

300.2 *[Section 110.7]* Mandatory Requirements to Limit Air Leakage

300.3 *[Section 110.8]* Mandatory Requirements for Insulation, *Roofing Products* and *Radiant Barriers*

Item #2: Page 163: Table 102.5(1)

Suggested edit: change the roofing-products references from 301.5.2.2.2 and 301.5.2.2.3, to 301.5.2.2.3 and 301.5.2.2.4.

	heating requirements.	heating requirements.
Roofing Products	The requirements of Sections 301.5.2.2.2, 301.5.2.2.3 *[Section 141.0(b)2B]*.	The requirements of Sections 301.5.2.2.2, 301.5.2.2.3 *[Section 141.0(b)2B]*.
Lighting System	The requirements of Sections	The requirements of Sections

Item #3: Page 328: Section 301.3.1.1

Suggested edit: add in a reference to 300.4, in addition to 300.3

301.3.1.1 *[Section 140.3(a)1Ai]* **Roofing products for ~~nonresidential~~ buildings with *nonresidential use designations*.**

Shall meet the requirements of Section 300.3 *[Section 110.8]* and the applicable requirements of Sections 301.3.1.1.1 through 301.3.1.1.3.

Exception to Section 301.3.1.1: *Roof* area covered by *building* integrated photovoltaic panels and *building* integrated solar thermal panels are not required to meet the minimum requirements for *solar reflectance*, *thermal emittance*, or *SRI*.

Item #4: Page 366: Section 301.5.2.2.3

Suggested edit: Replace 300.3.7 with 300.4.1 in the roofing products reference

Exception to Section 301.5.2.2.2: *Alterations to healthcare facilities*.

301.5.2.2.3~~2~~ *[Section 141.0(b)2Bi]* **Roofing products.**

Existing *roofs* of a *nonresidential* or *hotel/motel* ~~*building*~~ *use designations* being replaced, recovered or recoated, as defined in Section 201 *[Section 100.1(b)]* and Title 24, Part 2, Chapter 2, shall meet the requirements of Section 300.3.7 *[Section 110.8(i)]*. When a *roof* with more than 50 percent of the *roof* area or more than 2,000 square feet of *roof*, whichever is less, is being altered, *roofing products* shall comply with requirements in Sections 301.3.1.1 and 301.3.1.2 *[Section 140.3(a)1A]*.

Item #5: Page 380: Section 302.3.7

Suggested edit: suggest changing reference to from 300.3 to 300.4

302.3.7 *[Section 150.1(c)11]* **Roofing products.**

All *roofing products* shall meet the requirements of Section 300.3 *[Section 110.8]* and the applicable requirements of Section 302.3.7.1 or 302.3.7.2.

Exception 1 to Section 302.3.7: *Building* integrated photovoltaic panels and *building* integrated solar thermal panels are not required to comply with the minimum requirements for aged *solar reflectance* and *thermal emittance* or *SRI*.

Item #6: Pages 383-384: Section 302.5.2.2.3

Suggested edit: add in a reference to 300.4, in addition to 300.3

302.5.2.2.3 *[Section 150.2(b)1I]* **Roofing products and insulation.**

Replacements of more than 50 percent of the exterior surface of existing *roofs*, including adding a new surface layer on top of the existing exterior surface, shall meet the requirements of Section 300.3 *[Section 110.8]* and the applicable requirements below ~~where more than 50 percent of the *roof* is being replaced~~.

Item #7: Page 393: Section 303.3.1.1.1

Suggested edit: suggest changing reference to from 300.3 to 300.4

303.3.1.1.1 *[Section 170.2(a)1A]* **Roofing products.**

All *roofing products* shall meet the requirements of Section 300.3 *[Section 110.8]* and the applicable minimum aged *solar reflectance* and *thermal emittance* requirements of Table 303.3-~~A~~(1) *[Table 170.2-A]*.

Exception 1 to Section 303.3.1.1.1: *Roof* area covered with *building* integrated photovoltaic

Item #8: Page 411: Section 303.5.2.2.1

Suggested edit: Replace 300.3.7 with 300.4.1 in the prescriptive requirements for alterations (roofing products and insulation).

303.5.2.2.1 *[Section 180.2(b)1A]* **Roofing products and insulation.**

TION 303 – MULTIFAMILY OCCUPANCIES

104 *2028 California Energy Code*

Existing *roofs* being replaced, recovered or recoated ~~*of a multifamily building*~~ shall meet the requirements of Section 300.3.7 *[Section 110.8(i)]*. For *roofs* with more than 50 percent of the *roof* area or more than 2,000 square feet of *roof*, whichever is less, being altered, the requirements below apply: