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Comment Received From: Justin Koscher
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PIMA Comments on Commercial and Multifamily Roof Alterations

Additional submitted attachment is included below.

Sent via Electronic Mail

July 28, 2021

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 21-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512
Docket@energy.ca.gov

Re: California 2022 Building Energy Efficiency Standards, Express Terms, Docket No. 21-BSTD-01, Roof Alteration Provisions

Dear Energy Commission,

Thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards that were released for public comment on July 14, 2021 (15-day language).

We urge you to make the following changes related to the roof-area-affected threshold for nonresidential and multifamily building roof alterations. The suggested change to the **highlighted text** below corrects a mistake and is important to ensuring the intended use of that threshold for multifamily buildings. The other changes are intended to improve readability and clarity.

Amend Section 141.0(b)2B

- B. Existing roofs of a nonresidential or hotel/motel building being replaced, recovered or recoated, as defined in Section 100.1(b) and Title 24, Part 2, Chapter 2, shall meet the requirements of Section 110.8(i). ~~For rRoofs where with~~ more than 50 percent of the roof area or more than 2,000 square feet of roof, whichever is less, is being altered, the requirements of i and ii below apply:

Amend section 180.2(b)1A

- A. **Roof Alterations.** Existing roofs being replaced, recovered or recoated, of a multifamily building shall meet the requirements of Section 110.8(i). ~~For rRoofs where with~~ more than 50 percent of the roof area or more than 2,000 square feet of roof, whichever is less, ~~is~~ being altered, the requirements of **i through iii** below apply:

Sincerely,



Justin Koscher
President