

DOCKETED

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*Comment Received From: Asphalt Roofing Manufacturers Association
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ARMA Comments on Docket 22-BSTD-01 – Single Family Peak Cooling

Additional submitted attachment is included below.



October 12, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Comments on Docket 22-BSTD-01 – Single Family Peak Cooling

Dear Commissioner McAllister and California Energy Commission Staff:

The Asphalt Roofing Manufacturers Association (ARMA) is a trade association representing North America's asphalt roofing manufacturing companies and their raw material suppliers. The association includes the majority of North American manufacturers of asphalt shingles and asphalt low-slope roof membrane systems.

ARMA appreciates the opportunity to participate in the pre-rulemaking phase of the 2025 California Code of Regulations, Title 24, Part 6 standards development process. The following comments are offered in response to the Single Family Peak Cooling presentation provided during the September 28th pre-rulemaking workshop. ARMA's comments address the process related to development of proposals for Single-Family Peak Cooling.

ARMA's primary concerns at this stage are as follows:

1. Changes related to Single-Family Peak Cooling for the 2025 Energy Code, and specifically changes to the 2025 CBECC software, are being proposed and presented at a very high level in public pre-rulemaking workshops while the Energy Commission is still in the process of making updates and changes to the 2022 version of the software.
2. There has not been any comprehensive detail or even written summary provided as to the impacts that the proposed changes will have on the Energy Code, including effects on existing prescriptive and performance compliance options and trade-offs.
3. Stakeholders and interested parties are being directed to review an updated "research version" of the 2025 CBECC software and provide input, due October 12, 2023, when the update does not appear to have been released as of the same date.
4. The Single-Family Peak Cooling proposals being considered and presented as part of the 2025 Energy Code development process have not been well thought-out and are being rushed to get them into the 2025 code instead of being comprehensively considered and presented in a complete, understandable package for stakeholders and the general public. Presentation in a format that does not require reviewers to be proficient in CBECC software is essential to permit investigation of the ramifications of the proposals by all interested parties.

Based on the September 28 presentation, we believe that the proposals may make current prescriptive compliance methods in the code mandatory, sacrificing tradeoffs and performance compliance options in the process. There is high variability among buildings in the state of California, including variability in building envelope details. The effect of proposals on all aspects of the affected buildings must be



seriously considered. As of now, no such detailed analysis has been presented to support any change in existing provisions.

In summary, ARMA is concerned that the Energy Commission has not released a meaningful proposal that outlines the specific effects of the proposal. Further, evaluation of the proposal requires proficiency with the CBECC software, making consideration of the proposal challenging for many stakeholders. ARMA encourages the Energy Commission to take a structured approach to consideration of Single-Family Peak Cooling proposals, and to present details that demonstrate the specifics of the proposals including impact on other sections of the code as well as the cost/benefit analysis required under the Warren-Ahlquist Act, potentially as part of a future code development cycle.

In closing, ARMA thanks the CEC team for their efforts and looks forward to working cooperatively as this development cycle continues.

Sincerely,

A handwritten signature in black ink, appearing to read "Reed B. Hitchcock".

Reed B. Hitchcock
Executive Vice President