

*Comment Received From: Roof Coatings Manufacturers Association
Submitted On: 11/3/2020
Docket Number: 19-BSTD-03*

Nonresidential High Performance Envelope - RCMA Comments

Additional submitted attachment is included below.



California Energy Commission

Re: Pre-rulemaking Workshop – October 20th, 2020 - Nonresidential High Performance Envelope (“Workshop”)

To whom it may concern,

Thank you for the opportunity to participate in the pre-rulemaking phase of standards development for the 2022 Title 24 Part 6 Building Efficiency Standards. The Roof Coatings Manufacturers Association (RCMA) is the national trade association representing the manufacturers of asphaltic and solar reflective roof coatings and the suppliers to the roof coatings industry. The association includes more than 70 members who manufacture in or ship products to almost every state in the country.

The following comments are submitted on RCMA’s behalf. RCMA staff and member volunteers have participated in stakeholder workshops and discussions with CASE team members; the roof coatings industry has a significant stake in the envelope provisions, specifically cool roofing standards. The comments are organized by the presentation sections and subject matter.

COOL ROOF

The Workshop includes various increases in the requirements for roofing reflectance, with the expansion of the provisions into additional climate zones, as well as increased reflectance values across multiple occupancies.

Climate Zone Expansion. RCMA is not opposed to the expansion of the requirements into additional climate zones; RCMA’s reasoning is that the current standards establish a basis for production and inventory of Title 24 code compliant roofing products. Extending the reach into additional zones could reduce costs of inventory by eliminating product SKUs. RCMA’s position on this geographical expansion is not based on agreement with the modeled energy savings in the Report.

Increased Reflectance. The Report also includes increased reflectance values across multiple climate zones and occupancies, for steep-slope assemblies. RCMA opposes the increased reflectance requirements. Our objections are based on multiple concerns: cost impact, concerns with the continued use of energy modeling rather than based on confirmed observation of implemented provisions, and loss of choice in the roofing market - especially for reroofing.

ROOF ALTERATIONS

Definitions. The CASE Report included the addition of definitions for *roof recover* and *roof replacement* to Part 6. Those definitions are consistent with the California Building Code (CBC) and provisions for reroofing therein. RCMA supports the use of consistent terminology due to the need for correlation between the various codes and standards for roofing materials across multiple codes in California. RCMA requests that these definitions



be proposed and supported by the CEC.

RCMA would also request that the definition for *repair* be added to Part 6 based on the fact that many roof assemblies rely on the application of coatings as part of their constructions. Many manufacturer's instructions recommend maintenance applications of coatings and these applications would fall under the scope of the definition of repair.

Roof Recover Insulation Option. The CASE Report included a proposed increase in the reflectance exception for roof recovering with added insulation from R-7 to R-8, yet the Workshop proposed removing the current exception. Paired with RCMA's recommended definition inclusion of *repair*, RCMA would suggest an exception to the insulation requirement if a roof coating is being installed. RCMA would see this exception providing clarity that such an application falls under the definition of *repair*.

CONCLUSION

RCMA would like to acknowledge the efforts of the CEC for their efforts at collaboration, and note that we appreciate the challenges they faced during the development of the Workshop during this unprecedented pre-rulemaking phase.

In closing, RCMA respectfully requests that the State of California Energy Commission place a moratorium on increased reflectance requirements until peer-reviewed and comprehensive research into the energy savings and cost impacts of past reroofing projects on state-occupied or owned buildings, and on utility-incentivized buildings has been completed. RCMA believes it is time to validate the modeling approach using real-world results instead of simulations to determine whether or not projected energy savings and cost impacts are accurate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. Fischer", written over a horizontal line.

George A. Fischer

RCMA Director of Regulatory Affairs