



**Asphalt Roofing Manufacturers Association**

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**DOCKET**

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July 10, 2006

Elaine Hebert, Contract Manager  
Efficiency, Renewables, and Demand Analysis Division  
California Energy Commission  
1516 Ninth Street, MS-25  
Sacramento, CA 95814

RE: 2008 California Energy Efficiency Standards  
Proposed Increases in Roof Insulation Levels

Dear Ms. Hebert:

The Asphalt Roofing Manufacturers Association (ARMA) supports the proposed increases in roof insulation levels as part of the 2008 Energy Code update process. In light of the proposed increases, we request the California Energy Commission (CEC) review and confirm the cost effectiveness of current and proposed prescriptive "cool" roof requirements.

We also support the proposed variable roof insulation level increases in the 2008 Energy Code based on the individual climate zones. Adding insulation is an effective method to reduce both peak energy demand and to reduce energy consumption year round. Unlike simply adding a reflective roof membrane, there is no "heating" penalty associated with adding roof insulation. Also, when insulating values are based on Long-term Thermal Resistance (LTTR), there is no material loss of energy efficiency over time whereas a reflective roof membrane's reflectance properties degrade with time and exposure conditions.

Increasing insulation levels significantly decreases the energy saving benefits of installing reflective roof membranes. Based on our preliminary review, energy savings for California building owners associated with installing "cool" versus "non-cool" roofs based on 2005 insulation levels are significantly lower than energy savings based on the proposed 2008 insulation levels. In other words, the added cost of installing a "cool" roof under the proposed 2008 insulation levels may in fact not be cost effective in all climate regions.

In light of the proposed 2008 insulation levels, ARMA respectfully requests the CEC confirm the cost effectiveness of current and proposed prescriptive "cool" roof requirements as part of the 2008 update process for both non-residential and residential roofs (low-sloped and steeply sloped).

Please do not hesitate to contact me if you have any comments or questions. I look forward to seeing you in Sacramento on July 13.

Sincerely,

Reed B. Hitchcock  
General Manager

CC: ARMA RSG  
Bill Pennington, CEC