



**Asphalt Roofing Manufacturers Association**

1156 15<sup>th</sup> Street, NW, Suite 900  
Washington, DC 20005  
www.asphaltroofing.org

tel: 202.207-0917  
fax: 202-223.9741

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April 24, 2007

Payam Bozorgchami, Contract Manager  
Efficiency, Renewables, and Demand Analysis Division  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: 2008 California Energy Efficiency Standards  
Cool Roofing Proposals and Cost Justification Report

Dear Mr. Bozorgchami:

Pursuant to discussions at our November 15, 2006 meeting and concepts discussed thereafter with CEC staff and consultants, the Asphalt Roofing Manufacturers Association (ARMA) respectfully submits the following three PDF documents enclosed with this letter:

- A report entitled "Steep-Slope Residential Roof Covering Cost Survey Cool Roof Premiums" prepared for ARMA by Pacific Building Consultants
- An ARMA-prepared Measure Information Template entitled "Prescriptive Trade-off Alternative of Insulation for Roof Reflectance"
- An ARMA-prepared Measure Information Template entitled "Inclusion of Solar Reflectance Index as an Alternative to Reflectance and Thermal Emittance Requirements"

We have prepared these documents to assist in the development of sound decisions related to the inclusion of prescriptive requirements for minimum surface reflectance and solar emittance values for roofing products as part of the 2008-9 revisions to Title 24, Part 6.

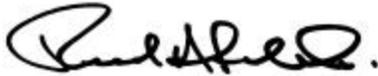
ARMA's position on energy savings and surface reflectance is that surface reflectance is but one component of the whole building approach as an appropriate regulatory policy and design principle for improving building energy standards. The whole building approach is the best option for designing performance-based, proven and cost effective energy-efficient commercial and residential buildings. It allows flexibility and consumer choice in the selection of wall and roof systems, as well as in the building's operating equipment.

Based on research and analysis conducted in cooperation with Oak Ridge National Laboratories and Pacific Building Consultants, it is ARMA's firm belief that prescriptive

requirements for steep-slope roofing are not justified by the cost premiums associated with them. We further believe that the cost justification for low-slope roofing must also be reconsidered due to the fact that an increase in base insulation levels is being proposed as well. However, in light of the fact that there seems to be a strong indication that the Commission plans to proceed with a requirement in spite of the cost justification issue, we have prepared the attached Measure Information Templates to offer builders and consumers options in the code that will meet or exceed the energy-savings associated with the prescriptive "cool" roof.

ARMA appreciates the opportunity to discuss these documents and to continue to work cooperatively with the Commission as part of the 2008 Update process. Please do not hesitate to contact me if you have any comments or questions. I look forward to seeing you in Sacramento on May 17.

Sincerely,

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

Reed B. Hitchcock  
General Manager

cc: ARMA RSG  
Bill Pennington, CEC