

**DOCKET****10-BSTD-01**

DATE JUL 14 2011

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July 14, 2011

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Docket No. 10-BSTD-01****Subject: July 15, 2011 Staff Workshop – 2013 Building Energy Efficiency Standards**

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This letter is in response to the proposal by the California Energy Commission to change the prescriptive aged reflectivity requirement within Title 24, from 0.55 to 0.70, or possibly 0.67, effective January 1, 2014.

As a manufacturer of PVC, single ply roofing membrane, Canadian General-Tower Ltd. has expended significant resources and time to develop, test and validate the field performance and safety of our current products to meet the existing requirements of reflectivity stipulated by the CEC. Based on this previous exercise, our company has the following concerns with the proposed legislation:

1. While we support the initiative of continuous improvement of roofing product offerings to the marketplace, proper due diligence and care must be exercised to ensure that the synergistic effects of formulation changes to address reflectivity do not have a significant negative impact on the durability, fire and wind uplift parameters, and field performance of the products. This requires time to first develop new formulations to meet the proposed requirements (which represent an increase in the range of 22-27% over existing values), schedule and perform fire and wind uplift testing mandated by the roofing certification bodies such as Underwriters Laboratories and FM Global, initiate reflectivity testing, perform the 3 yr. aging cycle (which could require close to 4 years alone as material is only initiated at the approved external weathering sites during the summer and winter solstices), retest the reflectivity and report results. The proposed effective implementation date of January 1, 2014 therefore clearly does not provide sufficient time to complete this cycle.
2. Canadian General-Tower Ltd. is not aware of any supporting CEC data to identify the energy savings benefit of the proposed changes versus the potential reduction in durability and hence material life cycle.
3. If the new proposed aged reflectivity changes are adopted prematurely, many proven products as exemplified through years of field performance history will be eliminated

Canadian General-Tower Ltd.  
52 Middleton Street, P.O. Box 160  
Cambridge, ON N1R 5T6



from consideration thereby reducing the competitiveness of viable products. This will have a long term negative effect on the future continuous improvement of roofing products.

For the reasons stated above, Canadian General-Tower Ltd. strongly objects to the proposed changes to Title 24 concerning the prescriptive aged reflectivity requirements of roofing products and their subsequent implementation in the 2013 code release. We recommend that the CEC work with the manufacturers and stakeholders of products impacted by the proposed changes to develop a reasonable and executable timeline that would allow for the necessary due diligence to be exercised in the product development cycle towards continuous improvement of reflectivity.

Thank you for the opportunity to express Canadian General-Tower's position on the proposed Title 24 changes.

Sincerely,

Carl D. Flieler, P.Eng.  
Product Development Specialist  
Canadian General-Tower Ltd.