

July 20, 2011

Payam Bozorchami
Associate Civil Engineer
Building Energy Efficiency Standards California Energy Commission
1516 9th Street, MS-25
Sacramento, CA 95814



DOCKET

10-BSTD-01

DATE JUL 20 2011

RECD. JUL 20 2011

re: California Low Slope Roof Standards

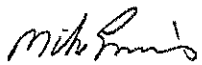
Dear Payam:

This letter is provided in response to the revised low slope roof code change proposals SPRI, Inc. (SPRI) received from Dan Suyeyasu in his email of July 1, 2011. While SPRI appreciates your consideration of the concerns expressed by the roofing industry with respect to the initial proposals, SPRI has four specific concerns that it contends need to be addressed.

1. The proposed simplified tradeoff procedure only covers products down to an aged reflectivity of 0.4. This effectively incorporates a mandatory minimum of 0.4 since it is unlikely that the necessary funds will be spent to pursue the performance path option for products with lower values. Accordingly, SPRI requests that the tradeoff procedures include insulation tradeoffs down to an aged reflectivity of 0.1, which is the default value specified in Title 24 for materials that do not have a CRRC rating.
2. The required insulation levels for the simplified tradeoff procedure seem to be very high and are not consistent with the values obtained during the 2008 CEC tradeoff analysis. Accordingly, SPRI recommends that the same model be used for the present analysis as was used in the 2008 analysis. In addition, regarding insulation levels, SPRI requests before it can consider further the possibility of supporting the proposed revisions, that you provide an explanation of how these insulation levels for the simplified tradeoff procedure were obtained.
3. In determining the cost impact of increasing the aged reflectance requirement from 0.55 to 0.67, only material costs were considered. Therefore, SPRI recommends that the material life cycle cost should be the primary consideration when you determine the cost impact
4. While the revised proposal does allow for the use of additional products as pointed out in Mr. Suyeyasu's email, it still eliminates more than 1/3 of the current product options. This is done with incomplete cost considerations, which will limit the consumer's choice of proven roofing materials. The likely reduction in product choices will inevitably add cost to the construction of the building due to the resulting diminishment of competition, which in turn, will ultimately hurt the economy of California. Moreover, even if the study were complete and conclusive, it would not allow manufacturers sufficient time to develop new products to meet the Title 24 requirements. Therefore, to develop new products to meet such requirements will require increased product development time for manufacturers in addition to the 3-year product exposure time required by Title 24.

Until the above items have been addressed and resolved appropriately and fully SPRI cannot support the proposed revisions to the Title 24 low slope roof system requirements.

Sincerely,

A handwritten signature in black ink that reads "Mike Ennis". The signature is written in a cursive, slightly slanted style.

Mike Ennis
SPRI Technical Director
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