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California Energy Commission

Dockets Office

1516 Ninth Street

Sacramento, CA 95814-5512

DOCKET 12-BSTD-1
DATE MAR 12 2012
RECD. MAR 15 2012

Re: Docket No. 12-BSTD-01

The following is a written copy of the comments provided by our representative at the March 12, 2012 hearing.

Fundamentally, we strongly disagree with any changes being made to the prescriptive requirements in Title 24. To date no comprehensive, compelling evidence of quantifiable benefits has been presented justifying the proposed changes. Conversely the changes are likely to lead to significant disruption in the market place, particularly, in light of the very short time frame to implementation. These changes will not benefit the State nor the consumer, and may result in the introduction of untested products, rushed to market without proper long term testing, with a high risk of shorter service lives; the ultimate waste of resources.

The CEC's willingness to move on some elements of their original proposal, such as reducing the emittance requirement from 0.85 to 0.75, is recognized and appreciated. There are however still numerous problems with the current proposed language.

There is absolutely no credible scientific basis for different prescriptive reflectivity requirements for new construction and alterations. Additionally, the potential energy cost savings differential between 0.63 and 0.65 aged reflectance are at best, in the order of one tenth of one penny per square foot per year. Considering the numerous ranges of error in many of the parameters of the model, the tolerances in the measurements of the properties, etc., there is no statistical difference between the two. If the prescriptive reflectance value is to be increased from 0.55, it should be set at 0.63 for both new construction and for alterations.

Similarly, there is no reason not to allow the insulation trade-off to be applicable to both new construction and alterations.



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Low levels of compliance appear to be one of the programs most serious issues. There are no doubt many reasons for this, and although we believe this is a critical problem, this is clearly not the forum to begin those discussions. We are certain however that we can all agree that increasing the complexity of the prescriptive requirements by having differences in aged reflectance and solar reflective index values, and in the allowance for the use of the insulation trade-off, between new construction and alterations, will only lead to further confusion and no doubt even lower levels of compliance. There is no need whatsoever or any benefit to be gained by doing so. Prescriptive requirements should be simple, transparent and easy to understand for all stakeholders.

Data supporting the need for any change is still sorely lacking, and we believe maintaining the status quo would be best under the circumstances. However, if changes must be made, we believe the compromises we, and others, have proposed will allow the CEC to achieve their objective of raising the bar with each code cycle, while reducing, not eliminating, but reducing market disruption.

We appreciate the opportunity to communicate our position to the CEC. We urge you in future code cycles to engage the industry much, much sooner in the process. The adversarial situation created by inviting industry's participation so late in the process could be one of cooperation if the parties were not operating under such difficult time constraints.

Best regards
Sika Sarnafil
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