



California Energy Commission

DOCKETED

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TN # 75536

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March 26, 2015

Maziar Shirakh, P.E.
Senior Mechanical Engineer, Project Manager
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Via electronic mail to: docket@energy.ca.gov

Dear Mr. Shirakh:

The CEC is currently planning on changing Section 150.2(b)1Hlg from the current R-4 above deck insulation to R-2 above deck in the 2015 Energy Code.

We are requesting that this be a change to R-1 above deck based on the attached information provided by Mr. Ken Nittler, P.E. with Enercomp, Inc. This data demonstrates that an R-1 above deck insulation out performs "cool roof" requirements in California Zones 10-15 and therefore we are asking that this be placed on the current docket under the 45-day review period.

Thank you for the opportunity to provide our input on the proposed code changes. Please do not hesitate to contact our office if you have any comments or questions.

Sincerely,

Charlie Snowden
LEED AP

CC: Payam Bozorgchami, P.E.
Associate Civil Engineer