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Sika Sarnafil

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SENT BY E-MAIL TO: dware@energy.ca.gov, and by USPS

April 10, 2013

California Energy Commission
Dockets Office
1516 Ninth Street
Sacramento, CA 95814-5512
Attention: D. Ware

Re: Title 24, 2013 proposed 15 Day Roofing

Dear Mr. Ware

As discussed this afternoon, P. Bozorgchami and I exchanged a series of voice mails last week. In his last message to me, he advised me that he would be on vacation this week, and that I should speak to Mr. Shirakh in his absence. I spoke with Mr. Shirakh this afternoon and he indicated that my inquiry would be better addressed to yourself.

Based on the draft that was recently circulated, the CEC is proposing in Section 140.3 (a) 1. A. i. a. that the prescriptive requirement for Roofing Products in this subsection be:

1. A minimum aged solar reflectance of 0.63 and a minimum thermal emittance of 0.75: or
2. A minimum SRI of 75.

A solar reflectance of 0.63 and an emittance of 0.75 yield an SRI of 72.

According to Mr. Bozorgchami, the proposed SRI of 75 is based on 0.63 and 0.85 values for reflectance and emittance respectively. The 0.85 was the original value considered by the CEC before it was agreed to reduce it to 0.75 as is currently proposed.

According to the text that accompanies the Solar Reflectance Index Calculator on the CEC's website[1]

"The SRI alternative is useful when a particular product exceeds the Building Energy Efficiency Standards requirement for either the aged solar reflectance or the initial thermal emittance, but does not meet both requirements. In this case the combination of the aged solar reflectance and the initial thermal emittance for the product may be sufficient to comply with the SRI requirement".

[1]http://www.energy.ca.gov/title24/2008standards/sri_calculator/

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Having an SRI that is higher than that which is based on the minimums for the separate properties goes counter to the CEC's stated intended use of the SRI.

We genuinely appreciate the CEC's willingness to work with industry throughout the process of drafting the 2013 code. Having an SRI that does not reflect the values agreed upon for the reflectance and emittance, essentially penalizes the SRI option and will no doubt lead to confusion in the implementation of the code. We respectfully request that the CEC correct this value and insert an SRI of 72 as the alternative prescriptive requirement for cool roofs.

I would welcome the opportunity to discuss this matter with you at your convenience. I can be reached at (781) 332-3209.

Best regards
Sika Sarnafil
A Division of Sika Corporation

S.R. Graveline
Vice President Technical Services

Cc: P. Bozorgchami (Pbozorgc@energy.ca.gov)
M. Shirakh (Mshirakh@energy.state.ca.us)

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