



Together We Can Change
National Markets

January 19, 2006

Rachel Schmeltz
ENERGY STAR Product Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Schmeltz:

On behalf of CEE, I would like to thank EPA for the opportunity to provide comments on the proposal to revise the ENERGY STAR Roof Products Specification (Specification). The comments and recommendations below represent the consensus position of the CEE Residential and Commercial HVAC Committees (Committees). Organizations listed at the end of this letter have indicated their individual support of the comments.

Comments and Recommendations

Thermal Emittance Requirements

CEE supports EPA's proposal to add a thermal emittance requirement of 0.75 given the energy savings that are attributed to this requirement and value of aligning with the Cool Roof Rating Council's Ratings Program. Aligning the ENERGY STAR definition with other Cool Roof program requirements will minimize confusion in the marketplace and eliminate barriers to promotion by efficiency program administrators. Similarly, we also support allowing use of the CRRC Test Procedure for Variegated Roof Products

Use of Uncleaned Samples for Maintenance of Solar Reflectance Test

We support ENERGY STAR testing requirements that resemble real world conditions, as these requirements increase the level of certainty that CEE member programs will achieve the expected energy savings and peak demand reduction. Because roofs are seldom cleaned, CEE agrees that the allowance for cleaning of roof samples or surfaces before solar reflectance tests are performed is not appropriate and should be eliminated.

Solar Reflectance Requirements

CEE recommends that EPA increase the proposed reflectivity requirements for low-slope roofs to 0.70, which would differentiate products that achieve sizable energy savings without significantly sacrificing the number of qualifying products. Raising the incremental energy savings of ENERGY STAR products will increase the likelihood that efficiency program administrators will actively promote labeled products, potentially with financial incentives, and will ensure that ENERGY STAR continues to signify products with excellent performance.

We also strongly support a steep-slope requirement that continues to allow shingle products to qualify for ENERGY STAR. Given current technologies, an initial solar reflectance requirement of 0.25 appears to be the upper limit of shingle-product performance. However, the incremental energy



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savings in some parts of the country are not sufficient to justify financial incentives. Further, other types of steep-slope materials, including metal and tile, achieve reflectance greatly exceeding 0.25.

CEE believes that the current market conditions merit a “two-tier” specification that would identify high-performance shingle products as well as steep-slope technologies that achieve exceptional solar reflectance. We recognize that ENERGY STAR is committed to maintaining a simple “yes or no” approach to labeling products, but encourage EPA to explore the appropriateness of a two-tier specification. CEE looks forward to continuing to work with EPA to develop a viable national market transformation strategy for roof products.

Please contact CEE Residential Program Manager John Taylor at (617) 589-3949 ext. 228 with any questions about these comments. Thank you again for the opportunity to comment on the ENERGY STAR Roof Products Specification.

Sincerely,

A handwritten signature in black ink that reads 'Marc J. Hoffman'.

Marc Hoffman
Executive Director

Supporting Organizations

ACEEE
Idaho Power
Natural Resources Defense Council
NSTAR
PacifiCorp
Pacific Gas & Electric
Sacramento Municipal Utility District
Wisconsin Division of Energy