



Together We Can Change
National Markets

May 12, 2006

Steve Ryan
C/O Charles Anderson
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Ryan:

On behalf of CEE, I would like to thank EPA for the opportunity to provide comments on Draft 2 of 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 applauds 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 (CRRC) Ratings Program. While this requirement is particularly beneficial in heat-dominated climates, building owners in colder climate regions will also benefit due to reductions in the heat island effect in urban areas. Aligning the ENERGY STAR definition with other CRRC program requirements will minimize confusion in the marketplace and eliminate barriers to promotion by efficiency program administrators. We also support allowing use of the CRRC Test Procedure for Variegated Roof Products.

ENERGY STAR Testing Requirements

We continue to support use of uncleaned samples for Maintenance of Solar Reflectance. ENERGY STAR testing requirements that better resemble real world conditions 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.

Similarly, CEE recommends EPA consider requirements that will improve the validity of product performance data. One option would be to require all appropriate performance data come from the CRRC and its approved test farms. The CRRC is a multi-stakeholder group that has developed a comprehensive scheme to deliver reliable performance data on manufacturers' products. It has established acceptable test methods, certified testing laboratories, criteria for independent test farms to be used, and has a verification procedure with random selection of qualified products for additional testing. Requiring CRRC data or implementing more rigorous manufacturer self-certification requirements would increase the validity of the data and ensure the continued integrity of the ENERGY STAR Program.



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Solar Reflectance Requirements

Even modest improvements in energy savings can have large cumulative benefits across the country and should be encouraged whenever possible. CEE continues to recommend 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.

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'. The signature is fluid and cursive, with the first and last names being the most prominent.

Marc Hoffman
Executive Director

Supporting Organizations

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