

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



July 9, 2010

Brad Blake  
Batten Plus, Inc.  
PO Box 5067  
El Dorado Hills, CA 95762

Dear Mr. Blake:

In accordance with the 2008 Title 24 Building Energy Efficiency Standards (Standards), the "Batten Up" plastic roof battens can be used as an alternative to installing a cool roof.

For steep sloped roofs, with roofing product densities greater than 5 lb/ft<sup>2</sup> in climate zones 1 through 16, a Cool Roof is required. However, according to Section 152(b)1Hii of the Standards, there are seven alternatives to installing a cool roof. They are:

- a. Insulation with a thermal resistance of at least 0.85 hr-ft<sup>2</sup>-°F/Btu or at least a 3/4 inch air-space is added to the roof deck over an attic; or
- b. Existing ducts in the attic are insulated and sealed according to Section 151(f)10; or
- c. In climate zones 10, 12 and 13, with 1 ft<sup>2</sup> of free ventilation area of attic ventilation for every 150 ft<sup>2</sup> of attic floor area, and where at least 30 percent of the free ventilation area is within 2 feet vertical distance of the roof ridge; or
- d. Buildings with at least R-30 ceiling insulation; or
- e. Buildings with a radiant barrier in the attic meeting the requirements of Section 151(f)2; or
- f. Buildings that have no ducts in the attic; or
- g. In climate zones 10, 11, 13 and 14, R-3 or greater roof deck insulation above vented attic.

The Batten Plus plastic battens can be used under clay or concrete tile roof systems when over an attic, as long as they provide the 3/4 inch air space over the roof deck and below the tile.

Sincerely,

A handwritten signature in black ink, appearing to read "Payam Bozorgchami", with a long horizontal stroke extending to the right.

Payam Bozorgchami  
High Performance Buildings and  
Standards Development Office