



<b>DOCKET</b>	
<b>12-BSTD-1</b>	
DATE	APR 09 2012
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**Via Electronic Submission**

April 9, 2010

California Energy Commission  
Dockets Office  
1516 Ninth Street, MS-4  
Sacramento, CA 95814

Subject: **Docket No. 12-BSTD-1** - 2013 Building Energy Efficiency Standards, 45-Day Language Express Terms

Dear California Energy Commission Members:

Please accept the following comments submitted on behalf of the Window and Door Manufacturers Association (WDMA).

WDMA is a national trade association representing the leading U.S. producers of commercial and residential windows, doors, and skylights for domestic and export markets. Members sell to distributors, dealers, builders, remodelers, homeowners, architects, contractors, and other specifiers in residential, commercial, and institutional markets. WDMA members manufacture high quality products designed and constructed to performance-based standards that provide for improved safety, comfort, and energy efficiency in both new construction and renovation of existing homes and buildings. As such, we have a significant interest in building codes and standards impacting the use of these products.

On the whole we appreciate and support the improvements being proposed for the 2013 edition California's Building Energy Efficiency Standards (Standards). At the same time, we like other interests are equally concerned that provisions incorporated in the Standards intended to achieve California's aggressive building energy efficiency objectives do not inadvertently work against those objectives in some cases.

With that in mind, we are concerned by the proposed revisions to the prescriptive requirements applicable to the use of skylights under the Residential Performance and Prescriptive Requirements (Chapter 8) of the Standards. In particular, we believe the proposed exception allowing only 10 square feet of skylights to be exempt from the 0.32 U-factor and 0.25 SHGC requirements unduly limits or discourages the use of highly efficient skylights in residential construction, even under the area-weighted average approach. In turn we are concerned this could potentially undermine the effective use of daylighting to help in achieving the energy efficiency objectives that have been set for these occupancies.

Ensuring the Standards adequately provide for and encourage the effective use of daylighting is especially critical as California continues on its aggressive path to net zero homes. In-line with that, as performance requirements for fenestration become ever more stringent in general, we believe that a reasonable distinction between the thermal performance requirements for skylights (and TDD's) from other vertical fenestration is warranted. While we believe this intent is recognized in the proposed exemption, the determination of 10 square feet appears to be somewhat arbitrary as well as ignore the more typical amount of skylight area that is incorporated into residential construction when skylights are used. We therefore believe 10 square feet is too limiting and that the commission should consider increasing the area allowed under the exemption.

We understand that Velux America Inc., is submitting comments suggesting the square foot exemption be increased to 16 square feet from 10 square feet which we support and likewise request that that

recommendation be considered by the Commission for the 2013 edition of the Standard. Given skylights are incorporated into building design for the express purpose of providing natural light and daylighting benefits, we believe basing the exemption on established common design practices incorporating their use is a reasonable approach and measure for purposes of the 2013 Standards.

In addition to the requirements for new construction, we are also very concerned by the even more restrictive requirements that are being proposed for replacement skylights. We believe requiring replacement skylights to meet the U-factor and SHGC requirements being proposed for new construction without exception is not only unreasonable, but will greatly discourage the replacement of existing inefficient skylights all together because of the significantly greater costs consumers will be forced to pay for products meeting those very stringent requirements. This would be especially disturbing given highly efficient ENERGY STAR compliant skylights would no longer be permitted. Among other concerns, we believe this would also be difficult for home and building owners to understand, especially when the benefits and practicality of requiring replacement skylights to meet significantly greater energy performance criteria than that required by ENERGY STAR is questionable.

That said, and with California's objectives in mind, we believe that the California Standards should not impose requirements on replacement skylights that are more stringent than the ENERGY STAR criteria for skylights. Specifically, we strongly urge the Commission to incorporate an exemption under section 150.2 (b) 1 B, allowing ENERGY STAR or equivalent skylights to be used when replacing skylights in existing residential dwellings constructed prior to the effective date of the 2012 edition of the Standards. We believe this is a more sensible and effective approach for California to improve the energy efficiency of existing residential construction through the replacement of existing inefficient skylights.

We greatly appreciate this opportunity to provide comments as the Commission continues its work to revise the Standards. Please contact me if the Commission has any questions regarding our comments or if we can assist with additional feedback.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey T. Inks', written in a cursive style.

Jeffrey T. Inks  
Vice President, Code and Regulatory Affairs

cc: WDMA Exterior Products Code Committee