



# BLOMBERG WINDOW

A CALIFORNIA CORPORATION

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**DOCKET**

**12-BSTD-1**

DATE \_\_\_\_\_

RECD. APR 27 2012

TO: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: Docket number 12-BSTD-1

SUBJECT: 2013 Building Energy Efficiency Standard, 45 Day Language, Express Terms

Dear Commissioners and Staff,

We are Blomberg Window Systems, a Sacramento window manufacturer for 43 years. Our comments are related to the Prescriptive Compliance Approach as indicated in the proposed 2013 Standards.

The Prescriptive table 150.1-C for Component Package A includes a maximum fenestration U-factor of 0.32 across all climate zones. The only product we offer that meets a U-factor of 0.32 is our fixed window.

We are currently developing thermally improved extrusions for our casement and fixed product lines. Even so, the thermally improved casement's minimum U factor is 0.38 including two layers of Low-e and an Argon filled air space.

The 2010 Energy Efficiency Standards include Table 151-D (Package E) that includes higher fenestration U-factors that are offset by using other energy conservation measures in the building design. We ask that a similar table is included in the 2013 Standard development. Our customers use the Prescriptive Package as a benchmark, e.g. "I need a window with a 0.32 U-factor." The new table 150.1-C will eliminate our products from qualifying.

It appears that the fenestration U- factor in the 2013 Standards has been reduced by 20% when compared to the 2010 Standards (0.40 to 0.32). Can a table similar to 151-D Package E of the 2010 Standards be included in the 2013 Standards and reduce the 0.57 fenestration U- factor by 20% to 0.45? This would prevent us and other aluminum window manufacturers from being eliminated by the Prescriptive Compliance Approach.

Aluminum windows, long on strength and durability, fall short in the U-factor arena. Even when thermally improved, they cannot reach the U-factors achieved by less conductive framing materials.

We are a small manufacturer making less than 5,000 products yearly. Please don't let the 2013 Building Energy Efficiency Standards put us out of business.

Thank you for your consideration,

# BLOMBERG WINDOW SYSTEMS

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