October 24, 2014

To: docket@energy.ca.gov

From: International Window Film Association

Docket: 13-CCEJA-1
RE: Comments on Proposition 39 Guidelines

The International Window Film Association (IWFA) strongly supports the adoption of the Proposed Draft Revisions to the Proposition 39: California Clean Energy Jobs Act -2015 Program Implementation Guidelines. The IWFA is a unified industry body of window film dealers, distributors, and manufactures serving as the third-party industry source for accurate technical information on window film products and its uses. The IWFA specifically supports the last item on the list of Substantive Changes which is the removal of Appendix F: Effective Useful Life of Energy Measures in Years. The IWFA agrees that Appendix F should be appropriately placed in the Energy Expenditure Handbook where it can be more efficiently maintained to keep current with advances in technology.

One example of a needed update to Appendix F is the Effective Useful Life (EUL) currently listed for the measure reflective window film. Our research has determined that the EUL for this measure has not been updated for many years and is simply outdated. Window films have made significant technological strides in the past fifteen years. These improvements include National Fenestration Rating Council (NFRC) testing of Solar Heat Gain Coefficient (SHGC), U-Factor and Visible Light Transmission (VLT) as well as manufacturers offering ten year minimum warranties (includes film, installation and glass). The CEC’s 2013 Building Energy Efficiency Standards now require window film to be NRFC labeled and require a minimum ten year warranty, and installed per IWFA visual quality standards for Applied Window Film (RA4.2.2.3).

IWFA suggests Appendix F list window film separately with a 15 year Effective Useful Life. The sources for Appendix F are the 2008 and 2011 Databases for Energy Efficiency Resources (DEER). Unfortunately DEER cites window film references from the early 2000s and earlier. IWFA is asking DEER in their current revision(s) to update the database to 15 years based on technological improvements as well as warranty and NFRC requirements. The Department of Energy’s Weatherization Assistance Program (WAP) requires analysis to determine cost effective improvements to buildings. The WAP software, the National Energy Audit Tool (NEAT), is in the eighth family of revisions. In NEAT V8 and subsequence software versions window films have been assigned a 15 year EUL (see following table).

Newer technology window films have been demonstrated to be very cost effective in the California market. The ConSol study Energy Analysis for Window Film Applications in New and Existing Homes and Offices (February 7, 2012) shows for existing buildings window film outperforms ceiling insulation, HVAC upgrades and air sealing. IWFA want schools to be given accurate information so Prop. 39 monies can be used in the most cost effective manner.
IWFA requests that the Prop. 39 Guidelines, Appendix F, list window film as separate line item with a useful life of 15 years. IWFA also suggests that a footnote be added to require window films to be NFRC certified and have a minimum 10 year warranty.

Respectfully,

Darrell Smith  
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NEAT V8.9.0.5 Screenshot of Software Library reflecting industry standards