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AIA-CA Support for solar shade credit in compliance software

Additional submitted attachment is included below.

AIA California

Commissioner Andrew McAllister
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Solar Shade Credit

Dear Commissioner McAllister,

On behalf of the American Institute of Architects California (AIA CA), an association of nearly 11,000 architects in California, I am writing to express our support for the addition of a compliance credit to the California Energy Commission's modeling software (CBECC and CBECC-Res) to allow proper credit to be given for the use of automated solar shades on windows.

The use of large glazing areas as features in commercial buildings, to improve daylighting options and hence occupant comfort, increases the importance of proper shading control to maximize energy efficiency. In residential buildings, larger window areas can add to the aesthetic appeal of the building as well as reducing indoor lighting requirements. The use of automated shades can compensate for the tendency of occupants to neglect to open and close shades.

According to the US DOE, "automated shade controls maximize the utility of natural light while preserving occupant visual comfort. Admitting more natural light enables daylight dimming controls to save lighting energy with an added benefit of savings in cooling energy. Lighting energy in the daylit zone is significantly reduced via implementation of dimming controls". Energy savings are possible in all California Climate Zones, with "[t]he highest energy savings[...] possible in cooling-dominated climate zones due to lighting and HVAC interactive effects".

Typical dual pane windows will allow 70% of the solar heat to pass through to the interior. The use of automated shades allows building owners or tenants to use windows with a high visible transmittance to increase daylight harvesting while minimizing solar heat gain. Studies show that energy savings upward of 20% are possible, with additional benefits of increased occupant comfort and productivity. Given that automated solar shades can be beneficial in both the new construction and the retrofit market, we request that the acceptance of this exceptional method request be treated as a priority.

Please don't hesitate to reach out if you have any questions regarding AIA California's support.

Thank you,

Scott Terrell
Director of Government Relations

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