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## **Single Family and Multifamily Envelope, Window Performance**

We are pleased that the CASE team considered recommendations sent last winter that we and others had submitted regarding fenestration prescriptive performance requirements.

These latest requirements have reasonable requirements for the most populated areas of the State. Our preference however is that the New Construction prescriptive performance state wide for single family and multifamily (Garden Style, Low-rise loaded corridor and Mid-rise 4 stories or less) be set to a maximum of 0.28 U-factor to match the South Central level of performance of the ENERGY STAR V7.0 criteria. We recognize that there are areas in California that would need to meet the more stringent ES criteria for the North Central and the Northern Climate zones, but the highest concentration of population resides in that "South Central ES Climate Zone. Recall also that ENERGY STAR is not meant to be adopted as code, rather is designed to be an aspirational goal for products to achieve a higher level of energy savings to consumers. We also believe that the SHGC ratings should be set to a maximum of 0.23, except in CZ 1, 3, 5 and 16.

These performances can be applied both to single family and multifamily construction of four or fewer stories which generally all use the same punched opening window and door assemblies.

California is experiencing some of the same effects of climate change as much of the rest of the country. It is getting warmer! U-factor requirements that are slightly more stringent than IECC Climate Zone 3 and SHGC requirements that generally are aligned with ES v7.0 for the South Central Climate Zone are not challenging to achieve and we expect the energy savings targets for California will be achieved without adding additional cost or burden.