

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

RE: Docket number 10-BSTD-01

SUBJECT: October 13 and 14, 2011 Workshop-2013 Building Energy Efficiency Standards

Dear Commissioners and Staff,

<b>DOCKET</b>
<b>10-BSTD-01</b>
DATE _____
RECD. <u>Oct. 28 2011</u>

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,

Charles Macher

Blomberg Window Systems