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November 28, 2011

Re: Docket number 10-BSTD-01

October 13-14, 2011 Staff Workshop – 2013 Building Energy Efficiency Standards

Via email to:

docket@energy.state.ca.us

Via federal express delivery (ten copies) to:

California Energy Commission
Dockets Office
MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA
95814-5512

Commissioner Karen Douglas
California Energy Commissioners
California Energy Commission Staff:

Pilkington North America, Inc. (“PNA”) and AGC Flat Glass North America, Inc. (“AGC”), two of North America’s leading primary flat glass manufacturers, previously submitted comments on the draft proposals set forth in the September 2011 CASE Report for Nonresidential & High-Rise Residential Fenestration Requirements presented at the October 13, 2011 staff workshop (“CASE Report II” or “Report”). Based on discussions with Staff, PNA and AGC would like to supplement their comments relative to the use of a single, ultra-low SHGC in all of California’s 16 climate zones.¹

While much of California is in International Energy Conservation Code (“IECC”) zone 3, it has some large geographic areas in IECC zone 4, Marine zone 5 and zone 6.² These are essentially the same climate zones used by ASHRAE 90.1 and 189.1.³

California currently proposes to use ultra-low SHGC values, ranging from **0.22** for

¹ PNA’s and AGC’s SHGC comments can be found in their letter to the Commission dated Oct. 31, 2011, beginning at p. 7.

² A map of the State of California divided by the climate zones found in the IECC is attached hereto as Addendum A, and it is taken directly from p. 20 of the 2013 CASE Report for residential windows.

³ A map showing the climate zones used by ASHRAE is attached hereto as Addendum B.

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operable windows to a high of 0.26 for storefront windows in IECC zones 4, 5 and 6. These proposed values are clearly inconsistent with the prescriptive paths of:

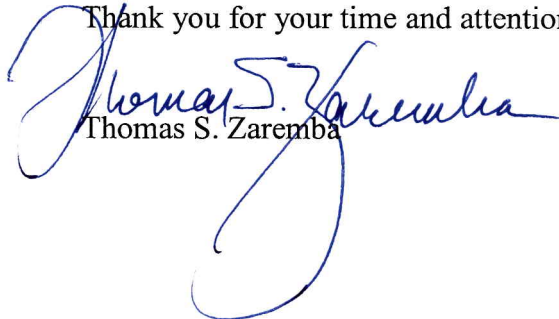
- The 2012 IECC and ASHRAE 90.1 since both set SHGC at 0.40 in these zones.
- ASHRAE 189.1 which sets SHGC at 0.35 in zones 4-5 and 0.40 in zone 6; and
- The 2012 International Green Construction Code ("IgCC") which sets SHGC at 0.36 in these zones.

It is clear that California's proposed SHGC values in these same climate zones are far below all of the other model energy codes that constitute the standards for energy conservation in this country and they are far below both of the country's green, stretch codes, namely ASHRAE 189.1 and the 2012 IgCC.

Other than simplicity, there, simply, is no sound energy basis for setting SHGC to block up to 78% of the sun's energy from entering commercial buildings in these heating dominated climates in California. Doing so will leave a significant amount of renewable energy from the sun on the table unused.

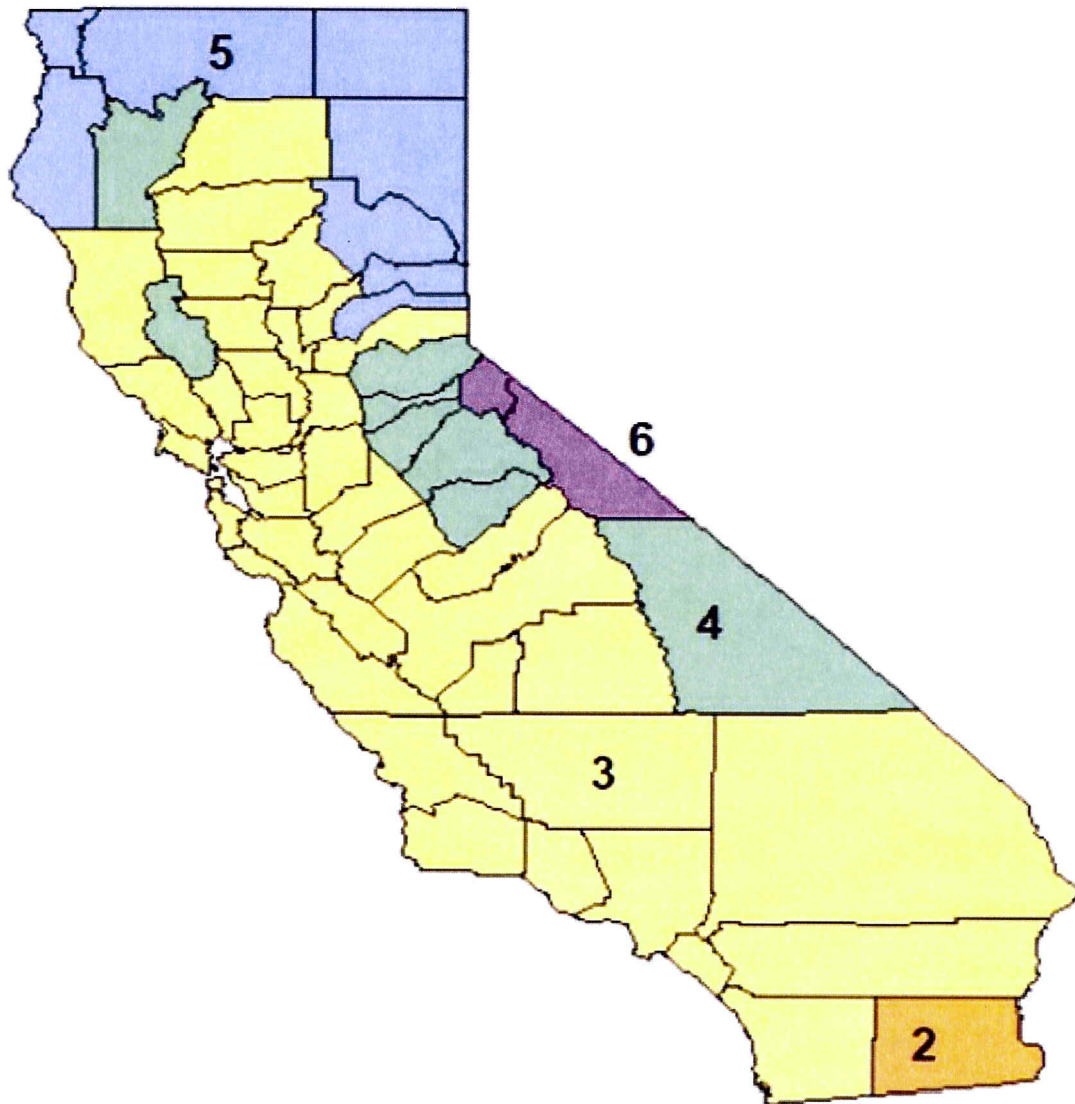
PNA and AGC ask that the ultra-low SHGC values in California's IECC zones 4 through 6 be reconsidered and set at the same values found in ASHRAE 90.1, the standard for commercial building construction in this country, or at the lowest, those used in ASHRAE 189.1.

Thank you for your time and attention,



Thomas S. Zaremba

Addendum A
California by IECC climate zone



Addendum B
ASHRAE Climate Zones Map

