

October 24, 2014

**To:** docket@energy.ca.gov

**From:** International Window Film Association  
**RE:** Comments on Proposition 39 Guidelines

**Docket: 13-CCEJA-1**

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 Our research has determined that the EUL for this measure has not been updated for many years and is simply outdated.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 NFRC 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 subsequent 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 wants 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,

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NEAT V8.9.0.5 Screenshot of Software Library reflecting industry standards

The screenshot shows the 'Setup Library' window in NEAT V8.9.0.5. The window title is 'WA 8.9.0.5'. The menu bar includes File, Edit, View, Insert, Format, Records, Window, and Help. The toolbar contains various icons for file operations and navigation. The main window has a sidebar on the left with a 'Weatherization Assistance Program' logo and database information: '<Database>: C:\ProgramData\Wear\Default Backend Data'. Below the sidebar are buttons for 'Setup Library' and 'Supply Library'. The main area is titled 'Setup Library' and contains a 'Library Name' field with the value 'Your Setup Library'. Below this are tabs for 'Setup Library Information', 'Key Parameters', 'Fuel Costs (1)', 'Fuel Price Indices', 'Library Measures', 'User Defined Measures (0)', and 'NEAT Insulation Types'. The 'Library Measures' tab is active, displaying a table with the following columns: #, Measure Type, Measure Name, Active, Default Contractor, Default Cost Center, Life (yr), and Costs. The table contains 13 rows of measures, with the 25th row, 'Window film', highlighted in yellow. Below the table are navigation controls for records, showing 'Record: 24 of 45'. At the bottom of the window are buttons for 'VIEW Site Built (NEAT) Measures', 'Select All', 'UnSelect All', 'Invert Select', and 'All Library Measure Costs'. A status bar at the very bottom reads 'Is this measure to be considered when this library is accessed. Inactive measures are not available for manual selection or considerat' and 'NUM'.

#	Measure Type	Measure Name	Active	Default Contractor	Default Cost Center	Life (yr)	Costs
17	Doors and Windows	Window sealing	<input checked="" type="checkbox"/>			10	Costs
18	Doors and Windows	Door replacement	<input checked="" type="checkbox"/>			20	Costs
19	Doors and Windows	Storm windows	<input checked="" type="checkbox"/>			15	Costs
20	Doors and Windows	Window replacement	<input checked="" type="checkbox"/>			20	Costs
21	Doors and Windows	Low E windows	<input checked="" type="checkbox"/>			20	Costs
22	Doors and Windows	Window shading (awning)	<input checked="" type="checkbox"/>			10	Costs
23	Doors and Windows	Sun screen fabric	<input checked="" type="checkbox"/>			10	Costs
24	Doors and Windows	Sun screen louvered	<input checked="" type="checkbox"/>			15	Costs
25	Doors and Windows	Window film	<input checked="" type="checkbox"/>			15	Costs
26	HVAC Systems	Thermal vent damper	<input checked="" type="checkbox"/>			10	Costs
27	HVAC Systems	Electric vent damper	<input checked="" type="checkbox"/>			10	Costs
28	HVAC Systems	IID	<input checked="" type="checkbox"/>			10	Costs
29	HVAC Systems	Electric vent damper IID	<input checked="" type="checkbox"/>			10	Costs