INTERNATIONAL WINDOW FILM ASSOCIATION®

P.O. Box 3871
Martinsville, VA 24115-3871
(276) 666-4932
Fax (276) 666-4933
email: admin@iwfa.com
www.iwfa.com

DOCKET
11-IEP-1F
DATE Jul 27 2011
RECD. Aug 01 2011

July 27, 2011

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento CA 95814-5512
Via email: [docket@energy.state.ca.us]
To: Gabe Taylor [gtaylor@energy.state.ca.us]

SUBJECT: **Docket number 11-IEP-1F**
Staff Workshop on Achieving Energy Savings in California Buildings

The following comments are submitted on behalf of the International Window Film Association, IWFA, which represents the manufacturers of 80% of the window film sold in California. Our members manufacture window film that reduces the solar heat gain coefficient of windows for both residential and non-residential buildings. These products are NFRC certified and a cost effective means of energy reduction.

Window films are a cost effective and accepted practice to reduce energy consumption in buildings. IWFA requests that the California Energy Commission include window films in energy analyses such as Title 24, Part 6 for new construction, HERS II for residential retrofit, AB 758 for retrofits, and AB 1103 for commercial retrofit as an option to improve energy efficiency. For example, the HERS Technical Manual on Fenestration and Door Modeling Rules (CEC-400-2008-012 Section 4.2.6) should be expanded to include the ability to model window films. This would give home and building owners more flexibility in meeting new and existing energy efficiency requirements while maintaining a high standard of energy efficiency. High performance glazing, shading, and interior blinds are all mentioned as options and we feel that window films should be included as well.

IWFA members have had discussions on the 2013 Standards with Commissioner Douglas and Panama Bartholomy, as well as on AB 758 with Nelson Peña. The IWFA would like to continue to participate in this process to ensure window films become an energy efficiency option for compliance in new and existing buildings.

Sincerely,

Darrell Smith
Executive Director

Cc: Chair Robert Weisenmiller,
Commissioner Susan Douglas
Deputy Director Panama Bartholomy
Lynette Esternon-Green [lesterno@energy.state.ca.us]