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20631 Annalee Avenue
Carson, CA 90746
800.321.2104 • 310.635.4929
FAX: 310.603.1266
www.johnsonlaminating.com

California Energy Commission
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California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento CA 95814-5512

RE: Docket No: 12-EBP-1
Subject: Comprehensive Energy Efficiency Program for Existing Buildings (AB 758) Draft Action Plan Staff Workshop

Dear Commissioner Andrew McAllister,

The following comments are submitted on behalf of Johnson Window Films Inc. located in Carson, California. Johnson Window Films Inc. fully supports the efforts of the California Energy Commission (CEC) and the California Public Utility Commission (CPUC) to maximize the energy efficiency of buildings. The AB 758 Draft Action Plan outlines a series of strategies to achieve a comprehensive market transformation of California's existing building stock. Johnson Window Films Inc. strongly encourages the CEC and the CPUC to include in the AB 758 Draft Action Plan updating and streamlining of the California Home Energy Rating System Program (HERS II).

The current CEC HERS II approved process and software need updating and simplifying. The energy efficiency features considered in the "loading order" should include all available, cost effective residential energy solutions, including window film. In California where 55% of residential housing was constructed prior to energy code, window film is one of the most cost effective energy features a homeowner can add to reduce cooling load.

AB Climate Change Scoping Plan and the CPUC's Long Term Energy Efficiency Strategic Plan call for reducing energy consumption in existing residential buildings by 40% by 2020. Updating and simplifying the HERS II process would add another tool to help achieve this ambitious goal for residential buildings.

Sincerely,
JOHNSON LAMINATING & COATING, INC.

Scott Davidson
President

SD:ds

Cc: Simon Baker, CPUC, Branch Manager, Energy Division
Dave Ashuckian, CEC, Deputy Director of Efficiency and Renewable Energy Division
Bill Pennington, CEC
Christine Collopy, CEC
Darrell Smith, IWFA, Executive Director