CPFilms Inc.
a subsidiary of Eastman Chemical Company
4210 The Great Road
Fieldale, VA 24089

EASTMAN

July 10, 2013

California Energy Commission
DOCKETED
12-EBP-1
TN 71591
JUL 12 2013

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

To: Commissioner Andrew McAllister

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

The following comments are submitted on behalf of the Performance Films Division of Eastman Chemical Company with distribution and manufacturing locations in Canoga Park, Orange, and Palo Alto, California. Eastman Chemical Company 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. We strongly encourage 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 32 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,

Lisa Winckler
Director Global MTS and Industry Affairs

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