



WINDOW FILMS • PHOTOVOLTAICS • CUSTOM COATINGS

July 12, 2013

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

California Energy Commission

**DOCKETED**  
**12-EBP-1**

TN 71597

JUL 12 2013

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 Saint-Gobain Solar Gard LLC, a Window Film manufacturer and distributor based in San Diego, California. Solar Gard energy saving window films have been manufactured in San Diego for more than 35 years and Saint-Gobain Solar Gard 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. Saint-Gobain Solar Gard 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 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,

A handwritten signature in black ink, appearing to read "Kathryn Giblin".

Kathryn Giblin  
Director Global Marketing & Technical Services



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