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SKYCO SKYLIGHTS

California Energy Commissio
DOCKETED
14-BSTD-01
TN 74257
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January 7, 2015

To: California Energy Commission
Dockets Office, MS-4

Re: Docket Number 14-BSTD-01
2016 Building Standard Update
Measure Number: NR-ENV-2-F

On behalf of Skyco Skylights, a skylight company which is based in California, and manufactures skylights in California, I would like to take the opportunity to express Skyco Skylights **SUPPORT** of the Title 24 energy code change proposal (Measure Number: NR-ENV-2-F) which will reinstate the minimum skylight area requirement to Section 140.3(c), while maintaining the overall simplicity of showing compliance. Approval of the referenced motion would carry forward the improvements in the energy savings requirements which have been previously included in the 2005 and 2008 Title 24 editions. It will also bring closer harmony with the current ASHARAE 90.1 and the IECC (International Energy Conservation Code).

I would assume that the reduction of the skylight-to-floor (SFR) area ratio was an oversight and consideration of the severe negative impact to California skylight manufacturers (Skyco Skylights, Bristolite Skylights and Sunoptics) was not considered at the time the language was assembled. However, not only will the reduction impact the bottom line of 3 of the largest skylight manufacturers in the USA which are based in California, it will also have a negative impact on skylight companies outside of California who conduct business in our State. I'm sure that the Committee did not intend to institute a policy that is harmful to California and National companies.

For additional substantiation of our position, I will defer to the CASE Report as added support data and findings concerning their position on energy savings, the environmental impact on greenhouse gas emission reduction, the impact on the market, economic considerations and assessments, the cost-effectiveness and the overall goal of Governor Brown's green policies.

A comment was made June 12, 2014 during a Staff Workshop on Proposed Energy Measures for Non-residential Buildings; that the 3% minimum skylight area requirement is inherent in the building performance method; however it was **inadvertently** dropped from the prescriptive requirements. Additional discussion at the Staff Workshop indicated that it should be reinstated and the supporting rational that was submitted for the 2005 and 2008 document revisions remain valid and should be utilized for substantiation. The Case Report further confirms the justification and the conclusive benefits which will be achieved.

It is incumbent on the California Energy Commission to rectify this inadvertent mistake and prevent economic damage to California skylight manufacturers. I'm sure it was not the intent to negatively impact California companies or the environment.

Please feel free to contact me if there are any questions.

Sincerely.
Skyco Skylights

Paul Simony
VP of Sales & Marketing