

# Glazing Industry Code Committee (GICC)

- GICC represents the full spectrum of architectural glass and glazing interests throughout North America.
- 15-member trade associations and companies including:
  - Glazing, window film, and sunroom trade associations
  - 4 of the 6 major low-e producers
  - Leading glazing fabricators
  - Fire and safety glazing suppliers
  - Window and wall manufacturers



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- AGC Flat Glass North America
- AIMCAL Window Film Comm.
- Arch Aluminum & Glass Co.
- DuPont
- Glass Assn. of North America
- Guardian Industries Corp.
- Kawneer Co., Inc.
- National Sunroom Assn.
- Oldcastle Glass
- Pilkington North America
- Pilkington PLC
- Schott North America
- Solutia Inc.
- Technical Glass Products
- Viracon Inc.



# GICC Consensus Positions on Energy Star

1. In pursuing greater energy conservation, maximizing the use of **trade-offs** will result in greater cost effectiveness.
  - Trade-offs offer equivalent energy savings while expanding the range of available products, stimulating competition, and reducing cost.
  - Alternative methods and trade-offs promote investment in new product development.
  - GICC strongly supports DOE's commitment to allow SHGC and U-factor trade-offs.
  - We applaud DOE's effort to include an annual energy performance metric in the north.  
However, we have some concerns ...

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2. Energy Star should encourage the use of low SHGC products in the south and high SHGC products in the north through use of a **minimum SHGC in the north**.
  - GICC is committed to the use of renewable energy resources. High SHGC products allow northern homeowners to capture the renewable energy of the sun to reduce heating costs.
  - High SHGC products are available from *all* of the low-e producers.
  - DOE is missing an opportunity to significantly increase energy savings in the north by not including a minimum SHGC.
  - The proposed criteria will cheat northern homeowners by inappropriately allowing very low SHGC products to qualify for the Energy Star label (e.g. 0.15 – 0.25 SHGC).
  - Likewise, the SHGC cap in the north is unnecessary, inconsistent with DOE's energy savings analysis, and could inhibit new high performance products.

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3. Energy Star should establish separate requirements for **hurricane impact resistant products** which promote both energy conservation *and* protection of life.
  - Hurricane impact resistant products are simply different from normal windows in construction and cost.
  - Energy Star sets separate requirements for windows, swinging doors, and skylights based on the very different design and performance of these products. The same should be true of hurricane products.
  - Separate requirements will help ensure that neither energy efficiency nor strict life safety requirements are ignored.

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## 4. Timing

### 2009 Criteria:

- GICC agrees that DOE must delay finalization of its 2009 criteria until after the ICC Final Action Hearings to consider the final outcome of the 2009 IECC and IRC energy requirements.

### 2013 Criteria:

- Although DOE is announcing proposed 2013 criteria now, GICC believes DOE should consider another round of stakeholder input and possible revisions nearer to the proposed implementation date.
- This will ensure that the technological feasibility and cost effectiveness of complying products will be more accurately assessed at that time.