June 3, 2016

Florida Building Commission
Energy Technical Advisory Committee

Re: Comments on Renewable Power Generation in the ERI

The American Architectural Manufacturers Association (AAMA) is a national trade association representing 275 corporate manufacturers and suppliers in the fenestration industry. AAMA offers the following comments regarding renewable power generation being counted as credits for compliance to the ERI score that will be discussed at the upcoming Florida Energy TAC meeting scheduled for June 7, 2016.

While AAMA supports integrated approaches to building design and performance, we have some concerns regarding renewable power generation replacing energy conservation measures as the ERI reference design values currently proposed; expressed as follows:

1. Baselines are not defined for the various building components which will degrade the overall performance of the envelope. No long-term studies have been developed which would confirm the impact that this might have on building structures.

2. Homeowner comfort can be compromised due to the potential degradation of individual building components, including but not limited to, fenestration, HVAC, and roofing systems. Considering the life cycle of residential buildings (50+ years), homeowners expect envelope efficiencies to be maintained long after site-generated energy systems are no longer in use.

3. AAMA is concerned about the indefinite time period proposed by Leading Builders of America (LBA) and Florida Home Builders Association (FHBA). Future code development is questionable due to a lack of defined time period.

4. AAMA requests that the TAC consider the Florida Solar Energy Center (FSEC) Option 7 proposal for R406.4 ERI-based compliance as an alternative to the proposal from LBA and FHBA. We believe that meets the intent of the ERI path of rating total building energy use of the referenced design while allowing some credits for on-site renewable power generation potential.
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5. While we understand that the Commission is under mandate to update the 5th Edition, AAMA believes that the normal code update process for the 6th Edition should be followed to make sure all viewpoints are heard.

AAMA appreciates the Florida Energy TAC’s time in considering these comments.

Sincerely,

Richard Walker
President and CEO
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