

Attachments Energy Rating Council 529 14th Street, NW, Suite 1280 Washington, DC 20045 www. aercenergyrating.org

April 16, 2024

Georgia SCAC Central Office 60 Executive Park South NE Atlanta, GA 30329

Re: Georgia State Energy Code Amendments

Dear Committee Members,

On behalf of the Attachments Energy Rating Council (AERC), I am writing in support of the proposed energy code modifications submitted to the Georgia SCAC as part of updates to the Georgia Energy Code by John Loyer on behalf of SOMFY. The AERC believes that these proposals covering automated dynamic glazing and shading attachments, manual and automatic shading, load management and standard reference design provisions will add flexibility to the Georgia Energy Code and allow designers to take advantage of energy savings **options** that incorporate advanced technologies to enhance energy savings opportunities for Georgia buildings. Windows have an important impact on building energy performance but are complex systems. It would be a mistake to ignore fenestration attachments as an important part of that system that can greatly enhance window and building performance. These proposals help address that gap. Equally important is the inclusion of the AERC standard for product ratings to ensure that products used for compliance to the Georgia Energy Code will provide expected the desired results.

I feel compelled to reiterate that these proposals only provide **options** in the Georgia Energy Code, (**not mandatory**) should builders and designers seek guidance from the code in how to save energy using automated and dynamic shading and glazing. This technology is more than prevalent in the market place and deserves fair treatment in the code and therefore further clarification for the built environment.

The AERC is an independent, public interest, non-profit organization initially established with US Department of Energy (DOE) funding whose mission is to provide consumers with credible, relevant, and comparable information about window attachments and their performance. AERC serves the public interest by providing accurate and credible information about the energy performance of window attachments, which will help consumers, including homeowners, architects, and builders, make informed decisions about window attachment products. The AERC is comprised of a diverse group of window attachment manufacturers, component manufacturers, public interest organizations, and utilities who are working together to deliver a successful energy rating program for the window attachment industry. DOE stakeholders include the US Department of Energy (DOE), Lawrence Berkeley National Laboratory, Pacific Northwest National Laboratory, Oak Ridge National Laboratory, D&R International, and Intertek/ATI. The AERC Mission is to provide accurate and credible information about the energy performance of window attachment products, as well as to rate, label and certify the energy performance.

It is through the AERC ratings certification process that window attachments and shading devices can demonstrate performance capabilities and ensure a level playing field. Analysis conducted by the U.S. Department of Energy (DOE) has shown that window attachments (shades, shutters, storm windows, etc.) have the potential to save

significant energy in residential and commercial buildings. DOE awarded funding to the Window Coverings Manufacturers Association (WCMA) to help capture these potential energy savings through the creation of a comprehensive rating, labeling, and certification program for window attachments. That funding helped launch AERC's formation and certification programming and is demonstration of the validity of using window attachments as an important piece in reducing building energy use while providing the necessary design flexibility for the architectural and engineering community.

The AERC Board of Directors includes representatives from the attachments industry, as well as the Northwest Energy Efficiency Alliance, the American Council for an Energy Efficient Economy, Oak Ridge National Laboratory, Efficiency Vermont, Pacific Northwest National Laboratory, and Lawrence Berkeley National Laboratory. Our informed staff, board, and broad membership can answer any questions you may have about AERC's program and the performance of energy saving window attachments.

Thank you for your consideration and support.

Regards,

Ralph Vasami, AERC Executive Director