



## **Statement of the Window & Door Manufacturers Association (WDMA)**

### **U.S. House of Representatives Subcommittee on Energy and Power Legislative Hearing on Energy Efficiency**

**April 30, 2015**

On behalf of the Window & Door Manufacturers Association (WDMA), we would like to thank you and the members of the House Committee on Energy & Commerce for conducting today's hearing to explore tools to promote energy efficiency. WDMA is a national trade association representing the leading producers of commercial and residential doors, windows, and skylights for domestic and export markets. Our members sell to distributors, dealers, builders, remodelers, homeowners, architects, contractors, and other specifiers in residential, commercial, and institutional construction markets. WDMA welcomes the Committee's interest in energy efficiency and higher-performing residential and commercial buildings, and is pleased to submit these comments.

#### Building Codes

WDMA supports the voluntary, consensus-based model code process. It is imperative that when considering building code measures, the targets be based upon sound science, are reasonably achievable and cost effective. It is also imperative that the consensus-based code development process be relied upon for developing the requirements for meeting those targets without undue influence by the Department of Energy (DOE).

WDMA believes Department of Energy (DOE) involvement in the established voluntary model codes and standards development processes should be supportive in nature by providing economic and energy savings research and analysis related to proposed revisions to them. The existing codes and standards development bodies, ASHRAE and the ICC, are already producing increasingly more energy efficient codes through a well-established, open and consensus-based approach with the full participation of stakeholders including DOE. DOE's role should not include actions that advocate, promote, or discourage the adoption of a particular building energy code, code provision, or energy savings target. WDMA believes legislation introduced in the House by Reps. Marsha Blackburn (R-TN) and Kurt Schrader (D-OR), H.R. 1273, the *Energy Savings and Building Efficiency Act of 2015*, which is contained in the discussion draft, is an excellent approach to addressing these concerns.

#### SAVE Act

WDMA supports fiscally responsible housing programs that make home ownership available to more Americans. The current test for loan affordability used by most covered agencies, commonly known as the "debt-to-income" test, is inadequate because it does not take into account the expected energy cost savings for the homeowner of an energy efficient home. Another loan limitation, commonly known as the "loan-to-value" test, is tied to the appraisal, which often does not adjust for efficiency features of houses.

The SAVE Act would help revitalize the hardest hit sectors of the economy by providing lower rate mortgage financing for cost effective energy improvements; giving builders and homeowners the option to recover the cost of efficiency investments, such as windows and doors; and enabling better federal mortgage underwriting while lowering utility bills for American households. A study conducted in 2013

of more than 70,000 mortgages found that mortgages on energy efficient homes were 32 percent less likely to be in default.<sup>1</sup>

#### Tenant Star

WDMA applauds the passage of S. 535 in both Houses of Congress, which establishes the Tenant Star Program to encourage cooperation between building owners and tenants with regard to energy efficiency upgrades. Most leased buildings currently suffer from a split incentive problem where tenants pay energy bills but are usually not occupants long enough to justify investing in energy-saving investments. WDMA is pleased that President Obama signed this legislation and allowed Tenant Star to move forward.

#### Federal Green Buildings

WDMA is supportive of language regarding requirements for high-performance green federal buildings. In particular, WDMA supports provisions that will allow multiple green building certification systems as options for the construction of high-performance green federal buildings, and provisions that will allow any rating system or certification system to be included in consideration for such. In addition, WDMA is also supportive of provisions prohibiting an approved system from discriminating against the use of domestic building products that have obtained certifications of responsible sourcing. WDMA believes the noted provisions are essential to any federal program for the construction of green federal buildings.

#### Conclusion

It is estimated that there are almost 1 billion single-pane windows still in service in American homes. Replacing those windows with ENERGYSTAR-qualified windows would save 1.12 quadrillion BTUs per year – an average of 20 million BTUs per house. Moreover, replacing single-pane windows from those homes would save an estimated \$10 billion in energy costs in one year, \$175 annually per homeowner. Window, door and skylight replacement is cost-effective, achieves immediate energy savings and contributes favorably to the value of the home.

Federal policies that incentivize window, door and skylight replacement to spur consumer purchases reduce the energy consumption of buildings and lessen our reliance on foreign energy sources. As an added benefit, the overwhelming majority of windows, doors and skylights sold in America are manufactured in America – providing manufacturing, distribution, retail and contractor jobs in every community across the country.

WDMA appreciates the Committee's work to develop proposals that will restore jobs and promote energy efficient retrofits and new construction.

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<sup>1</sup> [http://www.imt.org/uploads/resources/files/IMT\\_UNC\\_HomeEEMortgageRisksfinal.pdf](http://www.imt.org/uploads/resources/files/IMT_UNC_HomeEEMortgageRisksfinal.pdf)