



Comments of the Window and Door Manufacturers Association

to the

House Committee on Energy and Commerce
Subcommittee on Energy

March 23, 2021

Hearing on

"THE CLEAN Future Act: Powering a Resilient and Prosperous America"

WDMA Comments

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The Window and Door Manufacturers Association (WDMA) would like to thank the Subcommittee on Energy for the opportunity to provide this written statement regarding the hearing titled "THE CLEAN Future Act: Powering a Resilient and Prosperous America" on March 24, 2021.

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 the residential, commercial, and institutional construction markets. Member involvement in the built environment necessitates WDMA participation in the building code development process and we support common-sense provisions to ensure building codes are cost effective, transparent and implementable.

WDMA's manufacturers are leaders in the energy efficiency movement, developing innovative technologies to cost-effectively produce durable energy-efficient windows, doors and skylights for both new and replacement construction. We support policies that aim to reduce energy consumption through proven, commercially available technologies targeted to where the greatest and most cost-effective improvements can be made.

As such, WDMA would like to provide brief initial comments on the CLEAN Future Act, specifically regarding language on national building and energy codes as they pertain to energy efficiency and resiliency provisions being considered in this legislation.

WDMA supports uniform energy conservation regulation of residential and commercial buildings through the adoption and enforcement of national model energy conservation codes by states and local jurisdictions that are:

- Developed under nationally recognized accredited consensus procedures that allow for full participation by stakeholders in the development and amendment processes, such as the International Energy Conservation Code (IECC);
- Based upon commercially viable, available and durable technologies;
- Cost-effective, affordable, material-neutral and practical; and
- Based upon regional climatic differences through a limited number of defined climatic zones, such as those established by the International Code Council's (ICC) International Energy Conservation Code (IECC), the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 90.1, and EPA's ENERGY STAR® program and that provide requirements accordingly in a simplified format.

In addition, WDMA supports national model building codes that:

- Are developed and revised under nationally recognized consensus development processes open to participation by all stakeholders, such as those processes used by the International Code Council (ICC);

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- Include requirements for windows, doors and skylights that are appropriate for each product type, justified by sound data/science, can be reasonably met using current technology, and are cost-effective;
- Include requirements for windows, doors and skylights that do not discriminate against the use of any of particular types of products or do not bias towards specific materials;
- Include requirements for emergency escape and rescue in residential and commercial buildings;
- Incorporate requirements for natural ventilation and daylighting that reduce energy consumption, improve indoor environmental quality, and that can provide other benefits such as increased worker productivity; and
- Reference the most current edition of the North American Fenestration Standard (NAFS) for testing and labeling requirements and impose none that are duplicative of those contained in the NAFS.

Important to note is that WDMA supports the Department of Energy’s (DOE) participation in the development of national model energy codes and standards and recognizes the Agency’s role as a technical advisor in it, provided that the Department’s participation is fully transparent including:

- Publication of draft DOE proposed amendments to national model energy codes and standards, as well as the analytical methodologies, justification, feasibility, and other supporting information and data for them, in the Federal Register for public review and comment prior to advancing them;
- DOE determinations regarding the energy efficiency improvements in national model energy codes and standards are made in full accordance with the direction given the Department to do so under the Energy Conservation and Production Act; (ECPA) and
- Fully supported by validated scientific studies and data.

Conclusion

Based on WDMA’s experience with energy and building codes, we urge Congress to consider these positions as you develop comprehensive energy legislation in 2021.

WDMA looks forward to submitting more detailed comments regarding the proposals contained in the CLEAN Future Act and working with your offices on this legislation and other related proposals. Please contact Kevin McKenney at kmckenney@wdma.com with any questions or concerns.

Thank you again, for giving WDMA the opportunity today to share the window manufacturing industry’s perspective on this issue.