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FGIA Comments on 2028 Energy Code Pre-Rulemaking, Fenestration Provisions

Additional submitted attachment is included below.

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November 5, 2026

David Hochschild, Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

Cc: Vice Chair Siva Gunda, Commissioner Andrew McAllister, Commissioner Noemí Gallardo, and Commissioner Nancy Skinner

CEC Docket Number: 25-BSTD-03

Project Title: 2028 Energy Code Pre-Rulemaking

Subject: Comments on the Pre-Rulemaking Draft Regulatory Text – Nonresidential Fenestration (2028 Title 24 Building Energy Efficiency Standards)

Dear Chair Hochschild and Commissioners:

On behalf of the 350 member companies of the Fenestration & Glazing Industry Alliance (FGIA), we appreciate the opportunity to provide stakeholder feedback on the Pre-Rulemaking Draft Regulatory Text for the 2028 California Energy Code. Our members manufacture curtainwalls and storefront systems, windows, doors, skylights, and the glazing and other components that go into them for commercial and residential construction. We are overall supportive of the proposed text that addresses our product categories but have a few suggestions for your consideration.

Definitions

The proposal provides mostly stylistic edits to definitions for our member product categories, along with a few suggested changes to the definitions themselves. We would encourage the Commission to consider the following additional changes:

- Move the existing “Door” and “Door Area” definitions under the “Fenestration” definition. Fenestration products include both glazed and opaque doors, along with windows, skylights, tubular daylighting devices and glazing. It would make more sense and be easier for the code user to have all fenestration sub-category definitions under “Fenestration”. Additionally, we suggest these edits:
    - Clarify the “Door” and “Door Area” definitions are in respect to exterior doors by adding in the word “Exterior” in front of “Door” and “Door Area”.
    - Within the definition of “Door”, strike “Fenestration” at the end and have it say “See: Glazed Door” as the definition is now housed under “Fenestration”.

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- Suggest adding in “exterior door” to the existing “Fenestration product” definition that list types of fenestration products for consistency with the above recommendations.

- Under the “Vertical fenestration” definition it is being suggested to add “with less than 25 percent of glazing.” We respectfully disagree with adding this and believe it will only cause confusion. Further, if the door definitions are moved under the larger “Fenestration” umbrella, the code user can now easily find the definition of door as well as glazed door. Additionally, we are not aware of any code or standard that defines vertical fenestration in this manner. However, we would suggest one minor edit to the current “vertical fenestration” definition as follows:

    - Change the “and” to “or” between skylights and doors.

- Move “Operable Fenestration” where the other sub-definitions are housed, under “Fenestration”. If all the various definitions related to “Fenestration” are housed as sub-definitions, it would only make sense to move this one as well.

- Move “Skylight” and its sub-definitions under “Fenestration” for the same reasons listed above for doors and operable fenestration. A skylight is a type of fenestration product.

Section 301.3.6 Exterior doors

The proposal does not make any substantive change to this section; however, it is an example of why we believe the “Door” definition needs to be changed to say “Exterior door”. Further, we would suggest the word “exterior” be added in front of “doors” in the second sentence of this section.

FGIA appreciates the meaningful progress reflected in the pre-rulemaking draft. We believe our suggested refinements to the definitions will benefit code users and respectfully ask for your positive consideration. FGIA looks forward to continuing to work collaboratively with Commission staff and other stakeholders as the proposal moves forward.

Sincerely,

Jennifer Hatfield

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