

DOCKETED

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*Comment Received From: Window & Door Manufacturers Association
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WDMA Fenestration Comments

Additional submitted attachment is included below.



November 17, 2023

Commissioner Andrew McAllister
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: Docket No. 22-BSTD-01 Pre-Rulemaking Draft of the Express Terms for Single-Family Fenestration Requirements

Dear Commissioner McAllister:

The Window and Door Manufacturers Association (WDMA) appreciates the opportunity to comment on the fenestration measures for the Pre-rulemaking draft for the 2025 edition of California's Title 24 energy code. WDMA is a national trade association representing the nation's leading producers of windows, doors, and skylights for domestic and export markets. Our members sell to distributors, dealers, builders, remodelers, homeowners, architects, contractors, as well as other specifiers in the residential, commercial, and institutional construction markets. WDMA members manufacture high-quality products designed and constructed to performance-based standards that provide improved safety, comfort, and energy efficiency, for both new construction and renovation of residential and light commercial buildings.

WDMA actively participated in opportunities earlier this year to provide public input and acknowledges the thoughtful consideration given to our comments by the CASE team. Upon reviewing the October CASE Report on [Single Family High-Performance Windows and Walls](#), we find concerns with the unsolicited modifications made to prescriptive fenestration requirements. WDMA felt the May 17th CASE presentation proposed fenestration changes that were practical and cost-effective measures. We believe the May 17th changes enhanced energy efficiency and improved comfort without disproportionately escalating construction costs.

We are specifically concerned about the October fenestration changes made to Table 150.1-A (Page 84) and Section 5.4 (Page 87) where the maximum U-factors were decreased from 0.28 to 0.27 in all but one of the California climate zones. We encourage the CEC to reevaluate the fenestration U-factor and move it back the May 17th value of 0.28 for the following reasons:

- The change from the 2022 Title 24 U-factor of 0.30 to a 0.28 U-factor statewide will result in an already significant improvement of 7% in fenestration performance.
- Having a single fenestration U-factor will result in manufacturing and retail

- economies of scale bringing down overall construction costs.
- Moving the U-factor from 0.28 to 0.27 eliminates a lot of viable fenestration products from prescriptive compliance.
 - The 0.27 U-factor is especially problematic for the replacement window market where the consumer no longer has the flexibility to trade off a more cost-effective window with other building performance measures.
 - The ENERGY STAR program for [Windows, Doors, and Skylights](#) just revised its specifications last month. For all windows, and doors with over 50% glazing in the EPA's South-Central Climate Zone (which represents nearly all of California's population), the proposed fenestration U-factor of 0.27 exceeds the updated performance criteria outlined in the new ENERGY STAR requirements. ENERGY STAR is intended to be an above-code program. A U-factor of 0.28 would be more suitable and better aligned with the revised criteria.

Again, we appreciate this opportunity to comment on the CEC pre-rulemaking draft of the Express Terms for the 2025 Title 24. Please let us know if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Drumheller', with a long horizontal flourish extending to the right.

Craig Drumheller
Vice President of Technical Activities
Window & Door Manufacturers Association