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Docket No 24-BSTD-01 I-REN 15 Day Language

Please see attached comments filed by WRCOG on behalf of the Inland Regional Energy Network (I-REN).

Additional submitted attachment is included below.

INLAND REGIONAL ENERGY NETWORK

iren.gov

June 28, 2024
California Energy Commission Docket Office, MS – 4
Re: Docket No. 24-BSTD-01
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

RE: I-REN Comments on 2025 Energy Code Rulemaking, 15-day Language

Dear Commissioners and Staff,

I-REN supports updates to the solar heat gain coefficient (SHGC) for fenestration but seeks clarity on the language around exceptions in Section 150.2(b)1B.

The replacement fenestration updates in Section 150.2(b)1B is limited to a SHGC of 0.23 in CZ 15 in Exception 3. However, Exception 1 currently allows for a SHGC of 0.35 for replacement of vertical fenestration less than or equal to 75 square feet in Climate Zones 2, 4, and 6 through 15. This presents a discrepancy between Exception 1 and Exception 3, and I-REN believes that Exception 1 should apply to CZs 6-14, not CZs 6-15.

We appreciate the opportunity to review the proposed code 15-day language and provide comment and thank the CEC for their significant efforts.

Respectfully submitted,

/s/ Casey Dailey .

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