

DOCKETED

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Comments in Support of the Proposed 45-Day Language Express Terms Related to Fenestration

Additional submitted attachment is included below.

Before the California Energy Commission

Docket No. 17-BSTD-02: 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Comments in Support of the Proposed 45-Day Language Express Terms Related to Fenestration for the 2019 Building Energy Efficiency Standards

I am writing to express our support for the 45-Day Language Express Terms related to fenestration in the proposed 2019 California Building Energy Efficiency Standards.¹ In particular, we support the following fenestration proposals that are included in the 45-Day Language:

- (1) We **SUPPORT** the residential fenestration prescriptive values that are included in the component packages in Tables 150.1-A & B, specifically: 0.30 maximum U-factor for the entire state, 0.23 maximum SHGC in climate zones 2, 4 and 6 – 15, and NR for SHGC in the remaining climate zones.
- (2) We **SUPPORT** the reduced NFRC glazing exemption in § 110.6(a)2 of the Standards for site-built nonresidential fenestration. (We can also support elimination of the exemption in its entirety, and we recommend deleting it in the next Standards update).

As we stated and advocated in our prior comments submitted in this Docket, the proposed maximum prescriptive U-factor and SHGC values are a reasonable continuation and extension of the current requirements in the Standards. These values reflect the characteristics of a cost-effective high-performance window that is readily and broadly available in California at this time and will save energy and peak demand and improve the building envelope. Similarly, we supported retention of the current “NR” (no requirement) for SHGC in the climate zones that are deemed to be almost exclusively heating zones. (The NR approach is best for the reasons we articulated in previous comments). We very much appreciate Staff’s efforts in evaluating the options and for considering our comments and viewpoint and proposing these reasonable and appropriate requirements. We recommend that the Commission approve the 45-Day Language and implement in the 2019 Standards the proposed U-factor and SHGC values in Tables 150.1-A & B.

We also recommended in our prior comments in this docket and previous dockets that the 1,000 sq.ft. exemption from the NFRC rating requirements for site-built fenestration in nonresidential buildings that is currently in the 2016 Standards should be eliminated. Such a far-reaching exemption is a deterrent to proper enforcement, discourages widespread use of NFRC ratings, and undercuts a full transition to the use of NFRC ratings in the state. While we would like to see the exemption eliminated, we can also support Staff’s proposal to reduce the exemption from 1,000 sq.ft. of glazing to 200 sq.ft. as an appropriate next step and see it as a huge improvement over the 2016 Standards in this regard. Moreover, we recommend that the exemption be eliminated entirely in the next Standards update. Eliminating the exemption will ensure that all nonresidential buildings utilize consistent NFRC ratings or limited, conservative default values for

¹ Our efforts in this proceeding have been limited to fenestration-related issues.

verifiable features (just as is already the case for all residential buildings and manufactured fenestration in the state).

We thank you for the opportunity to provide these comments, and we look forward to continuing to work with the Commission and its Staff to improve building efficiency in California.

Respectfully submitted,



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