DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	230842
Document Title:	Door & Access Systems Manufacturers Association Comments - Proposed CEC Changes Involving Doors
Description:	N/A
Filer:	System
Organization:	Door & Access Systems Manufacturers Association
Submitter Role:	Public
Submission Date:	11/25/2019 12:14:30 PM
Docketed Date:	11/25/2019

Comment Received From: Door & Access Systems Manufacturers Association

Submitted On: 11/25/2019 Docket Number: 19-BSTD-03

Proposed CEC Changes Involving Doors

Please see the attached document, which contains code proposals for the 2022 California Energy Code development cycle.

Additional submitted attachment is included below.

Proposed Changes to the California Energy Code Submitted by the Door & Access Systems Manufacturers Association (DASMA) November 25, 2019

1. Revise Section 110.6 (a) 1 as follows:

1. **Air leakage**. Manufactured fenestration products and exterior doors shall have air infiltration rates not exceeding 0.3 cfm/ft² of window area, 0.3 cfm/ft² of door area for residential doors, 0.3 cfm/ft² of door area for nonresidential single doors (swinging and sliding), 0.4 cfm/ft² for nonresidential sectional doors, 1.0 cfm/ft² for nonresidential double doors (swinging), nonresidential power-operated sliding and folding doors and nonresidential rolling doors, and 1.3 cfm/ft² when tested according to NFRC-400 or ASTM E283 at a pressure differential of 75 pascals (or 1.57 pounds/ft²), incorporated herein by reference.

NOTES TO SECTION 110.6 (a) 1:

- 1. Pet doors must meet $0.3 \, \text{cfm/ft}^2$ when tested according to ASTM E283 at 75 pascals (or 1.57 pounds/ft²).
- 2. AAMA/WDMA/CSA 101/I.S. 2/A440-2011 is equivalent to ASTM E283 at a pressure differential of 75 pascals (or 1.57 pounds/ft²) and satisfies the airleakage testing requirements of this section.
- 3. ANSI/DASMA 105-2012 is equivalent to ASTM E283 at a pressure differential of 75 pascals (or 1.57 pounds/ft²) and satisfies the air leakage testing requirements of this section.

2. Revise Section 110.6 (a) 2 as follows:

2. **U-factor**. The fenestration product's U-factor shall be rated in accordance with NFRC 100, or ANSI/DASMA 105-2012 for sectional doors, rolling doors and high speed doors, or use the applicable default U-factor set forth in TABLE 110.6-A.

3. Add the following definition:

High Speed Door: A non-swinging door with a minimum opening rate of 32 inches per second, a minimum closing rate of 24 inches per second, and a means to automatically reclose the door.

Reasoning behind the proposal:

The current Building Energy Efficiency Standards do not address sectional doors, rolling doors, high speed doors, or power-operated doors. The sectional door, rolling door and high speed door air leakage requirement is in the 2015 International Energy Conservation Code (IECC.) The power-operated sliding and folding door air leakage requirement was approved (proposal CE113-16) for inclusion in the 2018 IECC. ANSI/DASMA 105-2012 is referenced as a testing alternative for sectional, rolling and high speed doors in the 2015 IECC.