

**DOCKETED**

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*Comment Received From: Thomas Culp  
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**Comment from NGA, AEC on fire-rated fenestration**

*Additional submitted attachment is included below.*



Docket number 24-BSTD-01

May 9, 2024

**2025 Energy Code Rulemaking**

Re: new exception for 110.6(a) for fire-rated fenestration

Previously I submitted comments on behalf of the National Glass Association and Aluminum Extruders Council expressing concerns about the proposed mandatory fenestration backstops in Sections 120.7(d) and 141.0(b)1E. (See comments dated Nov 17, 2023 under docket 22-BSTD-01.) Our concerns relate to the fact that backstops do not save energy, yet create potential compliance issues for non-standard products and applications. Some examples raised as potential issues were fire-rated fenestration assemblies, blast-resistant fenestration assemblies, and historic renovation projects.

We have become aware of others discussing related concerns and the need for an exception for fire-rated fenestration to ensure the energy code never trumps life-safety. It has been suggested to address this through a new exception under Section 110.6(a), and we agree this would also help mitigate our concerns about fire-rated construction. We suggest the exception be worded as follows to address fire-resistance rated glazed walls (curtain wall) as well as the fire-protective windows and doors in 716 to make it more inclusive:

(NEW) Exception 2 to Section 110.6 (a): Fire-resistance rated glazed walls, and windows and exterior doors that are required to comply with the provisions of The California Building Code Title 24 Part 2, Section 716 Opening Protectives.

This would not address concerns about blast-resistant fenestration, but those are rare and generally covered by DoD or Federal rules anyway.

While we still have general concerns about mandatory fenestration backstops, this would at least mitigate some of our issues, and we would be resolved if this were included.

Thank you again for the opportunity to comment, and please contact me with any questions.

Best regards,

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