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FGIA Fenestration Comments

Additional submitted attachment is included below.

May 13, 2024

Submitted via: [Docket Log 24-BSTD-01](#)

Re: Comments on 45-day language for 2025 Building Energy Efficiency Standards

California Energy Commission:

The Fenestration & Glazing Industry Alliance (FGIA) represents more than 420 member companies who manufacturer and market windows, doors, skylights, tubular daylighting devices (TDDs), and glazing components that go into them for residential and commercial application. In addition to member companies, FGIA represents hundreds of professional and technical members.

FGIA appreciates the opportunity to provide the following comments on the proposed 45-day language for the 2025 California Energy Code.

Table 150.1-A Component Package – Single Family Standard Building Design

Fenestration Maximum U-factor

FGIA recommends that for the 0.27 Maximum U-factor being proposed in Climate Zones 1-5, 11-14 and 16, that the California Energy Commission (Commission) consider changing that U-factor to 0.28. Doing so will better align those climate zones with the 0.28 U-factor being proposed in Table 170.2-A for Multifamily Standard Building Design.

Having climate zones better align between single family and multifamily are beneficial for several reasons. First, the slightly improved U-factor of 0.28 for any climate zone used to justify the proposal for multifamily, should also justify the requirement for single-family projects. It provides for greater product availability for in-state businesses/dealers, making it easier to offer these products that get installed into the same types of openings (i.e. punched) for either multifamily or single family projects. In turn, that larger product availability makes it easier for businesses/dealers, contractors, and homeowners to comply, and for the code official to enforce the requirements.

Fenestration – Maximum SHGC

In the review of the 45-day proposed language, FGIA could not find any documentation providing the rationale as to why for Climate Zone 15 the Solar Heat Gain Coefficient (SHGC) is changing from 0.23 to 0.20. To provide consistency with the other climate zones, FGIA urges

the Commission to change this back to 0.23. To do otherwise would require this small area to have a different SHGC from the surrounding areas, making product availability difficult.

Section 150.1(c)3A – Prescriptive Fenestration

FGIA is concerned that the addition of “a” in front of SHGC could be interpreted to mean that only the U-factor can use the area-weighted average and not the SHGC. We do not think that was the intent of the Commission and suggest the removal of the “a”. Alternatively, FGIA would suggest “area-weighted average” also be inserted in front of SHGC to make it clear both the U-factor and SHGC can use it.

Adding an Exception for Fire-resistance Rated Products

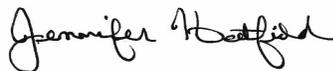
FGIA supports the inclusion of language that would ensure flexibility for fenestration U-factors when considering fire-resistance rated requirements found in the California Wildland-Urban Interface Code. Life safety must take precedence over energy conservation when it comes to fire safety. To that end, FGIA supports the exception language being submitted by the National Glass Association (NGA) as follows:

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.

Conclusion

We welcome your careful consideration of these comments. If you have any questions, please contact me at jen@jhatfieldandassociates.com on behalf of FGIA.

Sincerely,



Jennifer Hatfield
Codes Consultant
Fenestration & Glazing Industry Alliance (FGIA)

cc: Kathy Krafka Harkema, U.S. Technical Operation Director, FGIA, kkrafka@fgiaonline.org