

DOCKETED	
Docket Number:	24-BSTD-01
Project Title:	2025 Energy Code Rulemaking
TN #:	257481
Document Title:	Fenestration & Glazing Industry Alliance Comments - FGIA Comments on 15-day language
Description:	N/A
Filer:	System
Organization:	Fenestration & Glazing Industry Alliance
Submitter Role:	Public
Submission Date:	6/28/2024 6:44:52 AM
Docketed Date:	6/28/2024

*Comment Received From: Fenestration & Glazing Industry Alliance
Submitted On: 6/28/2024
Docket Number: 24-BSTD-01*

FGIA Comments on 15-day language

Additional submitted attachment is included below.

June 28, 2024

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

Re: Comments on 15-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 comments on the proposed 15-day language for the 2025 California Energy Code. We first want to thank the California Energy Commission (CEC or Commission) for addressing several of our 45-day language comments, specifically, adding in the exception for fire-resistance rated products and making the editorial fix to section 150.1(c)3A to address any possible interpretation issues.

However, FGIA was disappointed our other two suggestions were not positively considered and want to reiterate our concerns and objections to what remain in the 15-day language, as follows:

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 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

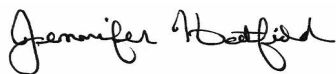
In review of the proposed language and documentation for both the 15 and 45 day language, FGIA still cannot find any documentation providing the rationale as to why, for Climate Zone 15, the Solar Heat Gain Coefficient (SHGC) is changing from 0.23 to 0.20. It is important to understand that with current triple silver low-e technology on the market today, when put into a fixed window, it is already difficult to meet the existing 0.23 SHGC. By dropping the SHGC to 0.20, it would require the consumer to purchase a more expensive tinted glass window.

We ask the Commission to provide what justification was used to make the change, when the result would mean homeowners in this climate zone would now be required to purchase higher-priced windows. 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 and more costly.

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