

<b>DOCKETED</b>	
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<b>Project Title:</b>	2025 CALGreen Rulemaking
<b>TN #:</b>	257482
<b>Document Title:</b>	Fenestration & Glazing Industry Alliance Comments - FGIA comment on 45-day language
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*Comment Received From: Fenestration & Glazing Industry Alliance  
Submitted On: 6/28/2024  
Docket Number: 24-BSTD-02*

**FGIA comment on 45-day language**

*Additional submitted attachment is included below.*

June 28, 2024

Submitted via: [Docket Log 24-BSTD-02](#)

Re: Comments on 45-day language for 2025 Green Building Standards Code

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 45-day language for the 2025 Green Building Standards Code. Similar to our comments on the 2025 Energy Code, FGIA has concerns with the Maximum Solar Heat Gain Coefficient (SHGC) change being proposed in Section A4.203.1.2.5, High performance vertical fenestration, for Climate Zone 15.

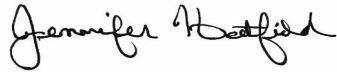
FGIA has been unable to find any documentation providing the rationale as to why, for Climate Zone 15, the Solar Heat Gain Coefficient (SHGC) is changing from 0.23 to 0.20. It is important to understand that with current triple silver low-e technology on the market today, when put into a fixed window, 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](mailto: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](mailto:kkrafka@fgiaonline.org)