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*Comment Received From: Window & Door Manufacturers Association
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WDMA Fenestration Comments- 15-day Review Period

Additional submitted attachment is included below.



June 28, 2024

Commissioner Andrew McAllister
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: Docket No. 24-BSTD-01 2025 Energy Code Rulemaking

Dear Commissioner McAllister:

The Window and Door Manufacturers Association (WDMA) appreciates the opportunity to provide feedback on the fenestration measures for the Energy Code Rulemaking for the 2025 edition of California's Title 24 Part 6 energy code. WDMA is a national trade association representing the country's leading producers of windows, doors, and skylights. Our members serve a wide range of customers including distributors, dealers, builders, remodelers, homeowners, architects, contractors, and other specifiers in the residential, commercial, and institutional construction markets. WDMA members are committed to manufacturing high-quality products that adhere to performance-based standards, ensuring enhanced safety, comfort, and energy efficiency for new construction and renovation of residential and light commercial buildings.

WDMA has been actively involved throughout the development of this edition of the California Energy Code. Over the past two years, we have provided public input at various stages of the process and recognize the Energy Commission and the CASE team for their thoughtful consideration of many of our comments.

However, WDMA has two remaining concerns that have not been addressed by the Energy Commission:

SHGC Change in Table 150.1-A for Climate Zone 15

- Page 484 of Table 150.1 shows a change in SHGC for Climate Zone 15 from 0.23 to 0.20.
- This change was introduced in the March 28th 45-day Language and no calculations justifying the change appear in any presentations made by the CEC or the CASE Team.
- Having a separate requirement for one, relatively unpopulated, climate zone is confusing and potentially problematic.
- For the sake of uniformity and the economies associated with a single SHGC requirement statewide, WDMA recommends retaining the 0.23 SHGC for Climate Zone 15.

Fenestration U-Factors in Table 150.1-A

- The October CASE Report further reduced the U-factor to 0.27, and these updated values have been maintained in the current 45-day draft language.
- The Environmental Protection Agency (EPA) developed a cost and energy savings analysis ([EPA Final Draft Data Package 1b- Savings Data](#)) to justify the revised specifications for ENERGY STAR V7.0 requirements. When using the EPA cost and savings values with a 0.28 U-factor baseline compared to an incremental change to a 0.27 U-factor window, the payback periods vary from 35 to 71 years.
- WDMA encourages the California Energy Commission to perform a similar incremental cost-effectiveness analysis comparing a baseline window with a 0.28 U-factor to one with a 0.27 U-factor.

Once again, we appreciate the opportunity to comment during the 15-day Review Period for the Title 24 Part 6 Code Changes. Please don't hesitate to contact me at CDrumheller@wdma.com if you have any questions regarding our comments.

Sincerely,



Craig Drumheller
Vice President of Technical Activities
Window & Door Manufacturers Association