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DOCKET

07-BSTD-1

DATE JAN 03 2008

RECD. JAN 03 2008

January 3, 2008

TO: Docket #07-BSTD-1, 2008 Building Energy Efficiency Standards

RE: Insulated Entry Doors

Previous to the 2005 Standards, a builder could receive credit for an opaque insulated entry door by specifying the certified U-value in the compliance software. In the 2005 Standards, a reference table was added (Table IV.28 in the Joint Appendices) that was to be used for all opaque doors. This limited opaque insulated doors to a minimum U-value of 0.50; meanwhile, the building industry has been using doors well below this limit for years. The NFRC website has numerous certified door products with U-values around 0.15¹.

If the door is considered a fenestration surface, then the U-value and Solar Heat Gain Coefficient (SHGC) can be specified according to certified values. If the door is considered an opaque surface, then the U-value is restricted to a few values from Table 4.5.1 from JA4 of the proposed standards.

CBIA suggests that opaque doors be allowed to use certified U-values and SHGC rather than Table 4.5.1 similar to how fenestration products are specified. In addition, Table 4.5.1 should be expanded to include default values for opaque insulated doors with U-values down to 0.13.

Sincerely,

Michael G. Hodgson
Chair, CBIA Energy Committee

Robert E. Raymer
Technical Director, CBIA

cc: Jackalyne Pfannenstiel, Chair and Presiding Member, CEC
Arthur H. Rosenfeld, Commissioner and Associate Member, CEC
Bill Pennington, Buildings and Appliances Office, CEC
Mazi Shirakh, Buildings and Appliances Office, CEC

¹ Examples:

http://cpd.nfrc.org/pubsearch/psLineDetails.asp?CPD=FRD-M-1_8416

http://cpd.nfrc.org/pubsearch/psLineDetails.asp?CPD=STN-K-13_8060

http://cpd.nfrc.org/pubsearch/psLineDetails.asp?CPD=PRD-K-2_4368