

8-3-2016  
Jeff Blair  
Associate Director  
FCRC Consensus Center  
Florida State University  
RE: ERI Options

Dear Mr. Blair,

Concerning the "homework" assignment given to the FBC ERI Workgroup members to provide our recommendations for renewable power (site generated) credits to help meet the ERI score, I offer the following:

I have had discussions with fenestration industry leaders and we have concluded that credit for site generated power is one path to achieving the maximum score allowed. But we also caution that credits must not be at the expense of the efficiency of the building envelope which will most certainly be in place for the life of the building. We strongly recommend that the mandatory provisions of the 2015 IECC, Section 406.2 be left in place and not compromised.

***R406.2 Mandatory requirements.*** *Compliance with this section requires that the provisions identified in Sections R401.2 through R404 labeled as "mandatory" and Section R403.5.3 be met. The building thermal envelope shall be greater than or equal to levels of efficiency and Solar Heat Gain Coefficient in Table 402.1.1 or 402.1.3 of the 2009 International Energy Conservation Code.*

It is our belief that this requirement will provide the minimum backstops necessary for the comfort of the occupants while also allowing for the incorporation of renewable power generation credit to help meet the ERI score of 58 if that performance path is taken.

I will add that as a part of the fenestration industry, the AAMA Skylight Council has also brought forward to me their concerns for this workgroup's consideration:

*The window industry, being comprised not only of vertical fenestration, but also of sloped glazing and skylights, wants to draw attention to the energy conservation and occupant comfort provided by skylights. Skylights provide substantial daylighting for the building; significantly reducing the amount of non-renewable energy used to provide electric lighting. Since both skylights and solar panels are usually placed on the roof, they compete for space. Yet both provide a benefit toward reduced non-renewable energy consumption. We encourage the workgroup to consider the skylight contribution to energy efficiency when deciding on allowable trade-offs for solar panels.*

Sincerely,

Steve Strawn  
Code and Regulatory Management  
JELD-WEN inc  
1631 NW Thurman, Suite 400,  
Portland OR 97209