

Washington State Building Code Council  
Attn: Ray Allshouse  
PO Box 41449  
Olympia, WA 98504-1449



Via email to: [sbcc@ga.wa.gov](mailto:sbcc@ga.wa.gov)

Your  
reference: Proposed Rule Making

Our  
reference: Comment Submittal

Date: 10-14-2013

**Amendments to WAC 51-11C and WAC 51-11R, the Washington State Energy Code, Commercial and Residential provisions**

To the SBCC Members:

We have are submitting comment regarding the addition of a new prescriptive provision in the Rule Making document filed July 23, 2013, which only recently came to our attention. The proposed new provision at issue is C402.3.1.3.

If the Council is providing this additional path permitting increased glazed area in walls based on providing economic relief to the fenestration industry, it is our contention that there is a glaring omission in the new language.

In the provisions preceding C402.3.1.3, both vertical fenestration and skylight areas are permitted to be a larger percentage of their respective envelope section areas when automatic daylighting controls are installed. It is our belief that the Council should be even-handed and insert a similar provision patterned after C402.3.1.3 that would be responsive to the needs of those who wish to employ high performance skylights. Just as high-performance fenestration is available for walls, skylights are available that qualify as high performance according to similar product performance surveys addressing roof-mounted fenestration.

Below is one proposal for your consideration, if it is agreed the revised section is incomplete:

**C402.3.1.4 Increased skylight area with high-performance fenestration.** The skylight area is permitted to exceed 3 percent but shall not exceed 5 percent of the roof area, for the purpose of prescriptive compliance with Section C402.1.2 or for the target UA calculation in Equation C402-1, provided that each of the following conditions are met:

1. The skylights shall have the following U-factors:
  - a. Nonmetal framing (all) = 0.45
  - b. Metal framing (fixed) = 0.50
  - c. Metal framing (operable) = 0.55
2. The SHGC of skylights shall be less than or equal to 0.35.

The compliance path described in this section is not permitted to be used for the total building performance compliance path in Section C407.



We trust this can be accomplished as part of the deliberations later this week. I would be available to answer any questions that may arise prior to the Council meeting, but I will be unable to attend due to a meeting conflict.

Yours Sincerely,

A handwritten signature in purple ink that reads "Roger LeBrun".

Roger LeBrun

Senior Product Certification Engineer  
**SKY-GPM**

**VELUX America Inc.**  
PO Box 5001  
Greenwood, SC 29648-5011

roger.lebrun@velux.com  
Telephone direct: 864-941-4828  
Telephone mobile: 864-377-1828