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**Canadian
Home Builders'
Association**



**Association canadienne
des constructeurs
d'habitations**

February 2, 2011

Chris Fillingham, Chair
c/o Anne Gribbon, Secretary
Canadian Commission on Building and Fire Codes
NRC/Institute for Research in Construction
1200 Montreal Road, Ottawa, ON K1A 0R6

Dear Mr. Fillingham:

I am writing with regard to the National Energy Code for Buildings and how the Fenestration and Door to Wall Area Ratio (FDWR) applies to dwelling units in colder climates.

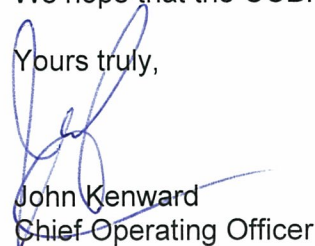
CHBA submitted comments during the public review on the need to maintain the FDWR at 40% in all climate zones for residential buildings rather than decreasing in the Prairie Provinces. At the meeting of the Standing Committee on Energy Efficiency in Buildings (SCEEB) of January 12-14, 2011, CHBA presented its concerns and demonstrated how a lower FDWR in colder climates would negatively affect dwelling units. As currently written, residents in smaller dwelling units or suites of care occupancy in the Prairie Provinces would be denied a reasonable amount of window area. Inevitably, new buildings would be designed to have less efficient floor plans in order to increase wall, and therefore, window area. This would erode the gains that the measure was meant to produce.

CHBA proposed that an exception be made for dwelling units and suites of care occupancy to maintain the same FDWR in all climate zones. This would apply only to the units themselves rather than to the overall building and the additional window area could not be traded off, except for window area in other dwelling units. While this measure would impact the energy budget, CHBA also proposed a solution to the problem of how the Code deals with residential buildings with a large exterior wall area using a second constraint based on unit perimeter. Taken together, the two revisions would likely produce a net reduction in energy consumption while creating consistency in the requirements for large and small residential buildings.

However, the Standing Committee was determined not to allow any further exceptions based on occupancy, in large part because of the policy directive from the CCBFC.

We hope that the CCBFC will convene a special task group to consider these recommendations further.

Yours truly,



John Kenward
Chief Operating Officer

cc: Mr. Ted Ross, Chair, Provincial/Territorial Policy Advisory Committee on Codes

cc: CHBA Executive Board