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Subject: Proposed Acceptance Criteria for Glass Façade Systems Containing Photovoltaic (PV) Modules (AC559)
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The following are my comments regarding the Proposed Acceptance Criteria for Glass Façade Systems Containing Photovoltaic (PV) Modules (AC559).

These systems are another form of building-integrated photovoltaic (BIPV) systems. Considering this terminology is used and defined in the I-codes and there are specific code requirements for these systems, this AC should at least use the term BIPV systems in the purpose and scope.

Although the 2018 and 2021 IBC do not include any specific requirements in Chapter 14 regarding these types of BIPV systems, the 2024 IBC does include a new Section 1411 to recognize them and provide code requirements. These BIPV system requirements cover both exterior wall coverings and fenestration, which would include these glass façade systems. The 2024 IBC Section 1411 requires these systems to not only comply with other provisions of the code, but also to be listed and labeled in accordance with UL 1703 or both UL 61730-1 and UL 61730-2. These standards include material testing requirements, such as durability. These standards are referenced in AC356, Acceptance Criteria for Building-Integrated Photovoltaic (BIPV) Roof Covering Systems to provide specific criteria for the PV materials used within the system.

Considering the requirements in Chapter 14 of the IBC, fire testing in accordance with NFPA 285 should be considered for these BIPV systems. In addition, should this proposed acceptance criteria address weather protection?

The proposed AC559 should include in the scope (Section 1.2) and in the evaluation report (Section 6.0) a statement that the electrical safety requirements and solar performance of these BIPV systems are outside the scope of this criteria, as is done in AC356.

Thank you for the opportunity to comment,

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