



ATOFINA Chemicals, Inc.

March 25, 2002

The Honorable David Garman  
Assistant Secretary for Energy Efficiency  
and Renewable Energy  
1000 Independence Avenue, SW  
Room 6C-016  
Washington, DC 20585

Dear Assistant Secretary Garman:

Thank you for sponsoring the Public Meeting last week to discuss new criteria for the Energy Star Windows program at the Department of Energy. As a stakeholder and longtime supporter of Energy Star Windows, I commend you on the open process by which you have undertaken to maintain the integrity of this important program.

I also appreciate the opportunity to reemphasize a major point from our session in advance of your deliberations to determine new guidelines.

While summertime peak demand and energy supply issues are certainly important for the nation, soft coat manufacturers have attempted to exaggerate the link between residential windows and peak energy shortages. As the report prepared by A.D. Little states, the potential annual peak energy savings due to reduced solar heat gain windows in the central region is 164 MW. In comparison, the 1999 total annual peak load in the U.S. was 681,449 MW according to the Energy Information Administration. The potential savings of windows to the peak load experience, therefore, is an infinitesimal 0.024%. A number far too small to be considered relevant. Under the guise of reducing summer peak demand, soft-coat manufacturers have stated their intention to push low SHGC requirements further north "all the way to Canada", in a transparent attempt to severely limit or eliminate a competing technology, pyrolytic low-e. Simply put, in the central and northern regions, any residential peak energy savings as a result of decreased SHGC is minor, and comes at the expense of much greater energy consumption in the winter.

Again, thank you for the inclusive nature which you have brought to this process. The public meeting was a very positive first step in ensuring the continued integrity of this worthwhile program. I hope the above comments will assist you in your deliberations and I look forward to continuing my participation with your office and the Energy Star Windows Program.

Sincerely,

Thomas Culp, Ph.D.

cc: Richard Karney

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