

The Honorable David Garman, Assistant Secretary
Office of Energy Efficiency & Renewable Energy
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

March 26, 2003

Re: ENERGY STAR Windows Criteria Proposed Changes

Dear Mr. Garman,

I am writing to express my concern about the proposed adoption of the 3-zone option for the ENERGY STAR Windows program. Although I am an employee of ATOFINA Chemicals, Inc., which would be significantly impacted by this proposal, I assure you that I do not blindly oppose any legislation that may negatively impact my company. However, this proposal will risk employee jobs and will result in reduced energy savings, at a time when unemployment and energy conservation are big concerns in the U.S. I encourage DOE to adopt the 4-zone criteria, which maintains competition in the marketplace, saves more energy, and allows for lower home heating costs for consumers.

I oppose the 3-zone proposal and support the 4-zone proposal because:

The 3-zone proposal will create a monopoly in the marketplace by eliminating the use of our pyrolytic Low-E glass, which incorporates high solar heat gain. This reduces consumer choice and increases consumer home heating costs, as well as risking loss of jobs. It is interesting that the 3-zone proposal places me, in Gilbertsville, PA, in the same climate zone as Phoenix! Consumers should at least have an opportunity to weigh the relative merits of cooling vs. heating efficiencies, based on their own circumstances and variables.

The 4-zone proposal saves more energy, as supported by your own analysis. This results in a direct benefit to the environment, the economy, and to the end homeowner/consumer.

Even the manufacturing and processing of pyrolytic Low-E products is more energy efficient. The alternative product consumes up to 9 times the amount of energy needed to produce an equal unit of pyrolytic Low-E glass.

The 3-zone proposal is the same as the one you withdrew last year after numerous objections were raised by members of Congress and industry. The 4-zone proposal is based on sound scientific study conducted by DOE.

One is left to wonder why the 3-zone proposal is being considered. It appears that reduction in peak energy demand is not a supportable justification. Hopefully it is not influenced by the desire of the major window manufacturers to cut costs, at the expense of a competitive marketplace, jobs, consumers energy costs, and energy conservation. In any event, for the reasons outlined above, the DOE should adopt the 4-zone proposal.

Sincerely,

David Koller
Safety Engineer
ATOFINA Chemicals, Inc.
Philadelphia, PA

cc: Congressman Patrick J. Toomey
Senator Rick Santorum
Senator Arlen Specter
Charles A. Kitchen, Director Government Relations, ATOFINA Chemicals, Inc.