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Heraeus Incorporated
301 North Roosevelt Avenue
Chandler, Arizona 85226
Telephone: (480) 961-9200
Telefax: (480) 961-9028

The Honorable Spencer Abraham
The Secretary of Energy
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Secretary:

On February 11th, after months of effort, the Department of Energy asked for comment on two alternative approaches to new Energy Star window criteria. The announcement asks for comment on both a three-zone approach proposed in the department's earlier announcement of May 8th, 2002, and a new four-zone approach favored by a small faction of window manufacturers and window component suppliers. We appreciate the opportunity to comment on this important energy conservation and environmental matter.

We believe the evidence is compelling that the three-zone approach, which is identified in the February 11th announcement as the Department's preferred option, is the correct approach and should be implemented as soon as possible. The three-zone approach has the support of the overwhelming majority in the glass and window manufacturing and retail industry. It clearly produces the maximum total benefit by providing the greatest peak load reduction of energy, in addition to significant national and regional consumer energy savings. Peak demand is a vital consideration. Reductions in peak load reduce the need to operate the most inefficient and costly power plants, and mitigate the impact of peak summer loads on electric reliability. The Department estimates that the three-zone model, when compared to the four-zone model, reduces peak load by an amount that would eliminate the need for one 115 MW power plant every year, for the next 40 years. Finally, the three-zone approach is far easier for commercial suppliers to apply and for Federal officials to administer.

We appreciate that the Department has made every effort to identify an option that all manufacturers and suppliers can embrace. While that has proven impossible in this case, it is reassuring that many producers of quality windows will be able to meet the proposed higher Energy Star standards, thus guaranteeing active competition in the marketplace.