

March 28, 2003

Richard H. Karney  
ENERGY STAR<sup>®</sup> Program  
US Department of Energy  
Forrestal, EE-40  
1000 Independence Avenue, S.W.  
Washington, DC 20585

Re: ENERGY STAR Windows Criteria Change 2003

Dear Mr. Karney:

The regional energy efficiency organizations represented below, the Northeast Energy Efficiency Partnerships, Inc. (NEEP) and the Southwest Energy Efficiency Project (SWEET), have been following with interest the proposed program update to the ENERGY STAR Windows program. Each of our organizations is an active partner in the ENERGY STAR program, and we promote the purchase of ENERGY STAR labeled products in our regions as an effective way for consumers to conserve energy, save money, protect our environment, reduce the need for power plant construction to meet peak demand, and very importantly, for consumers to be more comfortable in their homes, all at the same time.

We have reviewed the latest proposed upgrade to the ENERGY STAR Windows program and supporting analysis, and our organizations believe that the three-zone proposal would be the best available approach to upgrading the program at this time.

To reach this conclusion, we weighed the positive and negative attributes of both the three-zone and four-zone proposals the Department offered. Ultimately for us, the question over which proposal to support boiled down to two issues: 1) marketing *i.e.*, which would be easier for us to implement in our regional efforts, 2) the growing increased demand for electric air conditioning in our country and the importance of blocking solar heat gain to reduce electric air conditioning use even in heating climates.

First, we believe the three-zone approach will be easier to market to consumers in our region given its consistency with the current ENERGY STAR Windows approach and uniform criteria covering large areas of the U.S. (0.40 U-factor and 0.40 SHGC for the heating and cooling dominated central region). Moreover, the potential peak electric demand reduction capability and electricity savings and associated environmental benefits (pollution savings at the energy source) triggered by the three-zone proposal greatly influenced our decision. Your own analysis stated that by requiring lower solar gain windows (0.40 SHGC) throughout the center of the country, the three-zone proposal would save a 115 MW power plant every year over the four-zone proposal. We work very closely with the electric utilities in our regions and can appreciate first-hand just how vital their peak electric demand considerations are during summer cooling months.

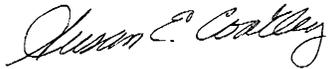
Mr. Richard Karney  
March 28, 2003  
Page 2

In addition, there are many other side benefits of the three-zone proposal that are also important for the consumers and utilities in our region, including electric system reliability, lower up-front costs for HVAC systems due to smaller cooling loads and equipment downsizing, and the economies of scale and lower high performance window product costs that will result across the country as low solar gain low-E glazing becomes even more prevalent. We also believe homeowner comfort is very important because it makes our job of promoting energy efficient products easier when they have a very desirable side benefit of improving occupant comfort year-round.

For all of these reasons, we believe the three-zone proposal represents the best option for an improved ENERGY STAR Windows program.

We thank you for the opportunity to provide these comments.

Sincerely,



Susan Coakley  
Executive Director, NEEP

---

Howard Geller  
Executive Director, SWEEP