

I would suggest you increase the SHGC in the Northern climate to the .40. The added solar gain may be beneficial to some passive designs.

EPA still needs to address the "High Altitude" problem in U-value restrictions because of the inclusion of breather tubes and deletion of inert gasses. The U-values are essentially reduced by 4, U-value points. There needs to be an exemption of gas and increase U-value acceptance in these areas in the form of a new clause in the IRC code.

I also want to mention the cost of creating a window to U-value .20 is going to be costly to the consumer. I suggest you do a cost vs benefit analysis to determine if the Energy Star program is just not causing a lot of expense in the building with limited benefit. Because U-values are based on conductive values you should actually be looking at the glass with the BTU long wave transference through the glass. I think you will find a triple panel piece of high performance glass does not perform a whole lot better than a dual pane high performance glass. Do the simple infrared heat lamp test with a BTU meter, this calculation or performance value is actually more important than the U-value. It is extremely hard to achieve low U-value and maintain a higher SHGC, you can't have your cake and eat it to. Use Cardinal 366 glass in dual pane, then two 366 panes in a triple pane configuration and see the minimal difference in BTU transference. The dual pane piece is doing a great performance job vs the almost double cost of triple pane with minimal performance difference.

I suggest a more cost effective glazing with a high degree of performance, but allows the affordability factor to be maximized. Let's get housing moving again, but lets start with looking at affordability first before we strap builders and home buyers down to higher building costs.

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