

Via Electronic Transmission Only
To mostefficient@energystar.gov

October 29, 2012

Ms. Ann Bailey, Director ENERGY STAR Product Labeling

Re: ENERGY STAR Most Efficient 2013 program-Draft Two
Proposed Recognition Criteria for Residential Windows

Dear Ms. Bailey:

We appreciate the speed of the EPA's response to industry comments regarding the original proposal for ENERGY STAR Most Efficient 2013 program for residential windows. The willingness of the agency to consider industry input is highly valued.

Our product database was sorted according to the criteria provided in the Proposed Eligibility for Recognition of Residential Windows Draft 2 ("Most Efficient Draft 2"), and found that less than 1% of 1,800,000 products JELD-WEN offers will qualify. In the recent Most Efficient conference calls, it was revealed that many appliance manufacturers have 5% to 10% of their products that qualify for the Program. We believe our recommendations in the chart below will allow the window manufacturers a similar amount of qualified products.

Even more disturbing though, is that only a small percentage of our products developed for the Volume Purchase Program will qualify. Even many of the triple-glazed products filled with Krypton do not qualify. JELD-WEN was one of the manufacturers that worked with DOE and EPA to establish the Volume Purchase Program, and spent a great deal of time and money to develop products to meet those criteria.

EPA's proposal of U-Factors conflicts with our interpretation of the main principles of the ENERGY STAR program. Products meeting the proposed requirements are not climate specific nor do they have an acceptable payback period. EPA has a responsibility to ensure the consumers are directed to the use of suitable products, and requiring triple-pane, exotic gas-filled units in southern Florida do not meet these program goals.

In consideration of the new SHGC requirement, we request that EPA reconsider the 0.20 minimum. JELD-WEN and other window manufacturers know their customers' preferences for

glass clarity. Our experience shows that there is a limit in how dark a glass can be for acceptability, and we do not sell darker than acceptable products.

We propose for your attention the following changes in the criteria of Most Efficient Draft 2.

Climate Zone	MOST EFFICIENT Draft 2 Proposed Criteria		JELD-WEN Proposed Criteria	
	U-Factor	SHGC	U-Factor	SHGC
Northern	≤ 0.20	≥ 0.20	¹ ≤ 0.20 / ≤ 0.22	Any
North-Central	≤ 0.20	≤ 0.40	≤ 0.22	≤ 0.40
South-Central	≤ 0.20	≤ 0.25	≤ 0.25	≤ 0.25
Southern	≤ 0.20	≤ 0.25	≤ 0.30	≤ 0.25

¹ ≤ 0.20 fixed / ≤ 0.22 operable

We would also like to comment on the length of time the product may retain the Most Efficient designation. As the Most Efficient program is currently written, there is little incentive for manufacturers to invest the research, development, and redesign required to meet the criteria. JELD-WEN proposes that once a product is highlighted by the Most Efficient program, that it retain that designation for three years, to allow for recovered costs, and also product recognition by the customer. The decision to purchase windows is not an impulse choice, but a purchase planned over many months. A customer should have the time to consider the Most Efficient products, and still have them available for purchase.

We fully support the first two criteria of the Most Efficient program. We endorse the criteria for ENERGY STAR partnership, and NAFS certification. In fact, we propose the bar should be set higher for NAFS certification. A Performance Grade of 15 is the entry level for the NAFS certification program, and the DOE Volume Purchase Program used an entry level performance grade of 25. Therefore, we recommend the Most Efficient program require a NAFS rating of 20.

The goal of the ENERGY STAR Most Efficient recognition program is to drive more energy efficient products into the market more quickly. To accomplish this goal, we recommend that suitable and available products for each climate are included in the program.

We appreciate EPA's willingness to work with industry and consumers to create the most effective program possible. Please feel free to contact us if you need more detailed information about our recommendations. The only way the consumer wins is when we all work together to create the best program.

Sincerely,

Ray Garries
JELD-WEN, inc.