

Via Electronic Transmission Only
To mostefficient@energystar.gov

October 12, 2012

Ms. Ann Bailey, Director ENERGY STAR Product Labeling

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

Dear Ms. Bailey:

Thank you for the opportunity to comment on the proposed criteria for the ENERGY STAR Most Efficient 2013 program for residential windows ("Most Efficient program"). We appreciate EPA's willingness to discuss, and modify, the proposed criteria for the Most Efficient program.

In addition to our remarks below on the criteria for Most Efficient program, we would 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 certification 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.

In consideration of the visible transmittance (VT) requirement, we request that EPA reconsider the 0.40. As EPA knows the NFRC VT is a whole product rating and does not primarily measure glass darkness. 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. Also, since the SHGC of the Version 5.0 ENERGY STAR program is used in the Most Efficient program, the possibility of using darkened glass inappropriately is minimized. If the Most Efficient program keeps VT at 0.40 it is very punitive to products with grids, or heavy frames and sashes. These products can have a VT as low as .31 and be acceptably clear to consumers. Thus, our recommendation to EPA is to eliminate the VT requirement for the Most Efficient program, and rely on the SHGC requirements.

EPA’s proposal of U-Factor and SHGC values conflicts with our interpretation of the main principles of the ENERGY STAR program. Products meeting the proposed requirements below are neither 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 is not meeting the program goals. We propose the following:

ENERGY STAR Most Efficient Proposed Criteria				JELD-WEN Proposed Criteria for ENERGY STAR Most Efficient program			
	U-Factor	SHGC	VT		U-Factor	SHGC	VT
Northern	≤0.20	Any	≥0.40	Northern	≤0.20	Any	Any
North-Central	≤0.21	≤0.40	≥0.40	North-Central	≤0.22	≤0.40	Any
South-Central	≤0.22	≤0.30	≥0.40	South-Central	≤0.25	≤0.30	Any
South	≤0.23	≤0.27	≥0.40	South	≤0.30	≤0.27	Any

JELD-WEN conducted a quick search of our 1,800,000 products in the CPD database that meet EPA’s proposed Most Efficient criteria, and less than .001 % qualified. 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 above will allow the window manufacturers a similar amount of qualified products in the South Central and Southern zones.

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 if we all work together to create the best system.

Sincerely,

Ray Garries
 JELD-WEN, inc.