

# COMMENTS OF THE MARVIN COMPANIES

*TO THE*

*U.S. ENVIRONMENTAL PROTECTION AGENCY  
ENERGY STAR® MOST EFFICIENT PROGRAM*

The Marvin family of companies takes energy efficiency very seriously when it comes to the products that we manufacture for our customers. In the past and continued future, we plan to support the Environmental Protection Agency's (EPA) ENERGY STAR program. We are excited that the ENERGY STAR Most Efficient Program has been announced and we look forward to having various products from all of our brands participate. With that being said, we do have a few comments about the parameters associated with the first draft of Most Efficient criteria.

## THE PROPOSED UFACTOR

Marvin's position is that we do not formally object to the proposed value of 0.20 for all climate zones for the Most Efficient program as we support simplification. However, we do not anticipate a high number of sales for windows with a  $\leq 0.20$  U-Factor in the Southern climate zone.

## THE SHGC PREDICAMENT

We understand following ENERGY STAR Version 5.0 as a benchmark for the first version of ENERGY STAR Most Efficient, however for the South Central and Southern zones of this first version, the program will be in direct conflict with any state that adopts the International Code Council's (ICC) 2012 Building Codes in ICC Climate Zones 1, 2, and 3. As states are already in the process of reviewing and implementing these codes, this could be a possible issue that the EPA should consider before finalizing this program.

## VISIBLE TRANSMITTANCE QUANDARY

We understand and support mandating Visible Transmittance (VT) ratings that prohibit the program inclusion of lower VT glass options that usually are not desirable to consumers. While we understand that these ratings cannot be based on the center of glass (COG) VT because of how the National Fenestration Rating Council (NFRC) actually rates their certified products, we would suggest that the "total product" ratings be adjusted, lowered so that all operator types with a 0.57 VT COG, including units with grill bars, comply. For a better understanding, please see the attached COG VT and Total Unit VT Matrix that is attached. From this chart you can see the dotted red lines that show "total unit" VT ratings vary between 0.50 and 0.32 all based on a COG VT of  $\geq 0.57$ . Based on this information Marvin recommends that the program draft VT rating of  $\geq 0.40$  can be lowered to VT rating of  $\geq 0.32$  without affecting customer satisfaction.

In conclusion, the Marvin family of companies supports certain areas of the proposed ENERGY STAR Most Efficient while we share the same goals of creating energy efficient products to help save overall energy. Thank you for allowing our company and industry to have such an involvement in forming this program. If you have any questions about our comments or the supporting matrix for VT, please contact Jim Krahn.