



Pilkington North America, Inc.

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November 1, 2012

U.S. Environmental Protection Agency
Via email: windows@energystar.gov

Doug Anderson
Project Manager
ENERGY STAR Windows, Doors and Skylights
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC, 20460
Via email: anderson.doug@epa.gov

Re: Comments to Draft 2 of the proposed Eligibility for Recognition of Residential Windows, ENERGY STAR Most Efficient 2013

Dear Doug,

On behalf of NSG Group/Pilkington North America ("PNA"), I express our appreciation for this opportunity to provide comments in response to Draft 2 of EPA's Proposed Eligibility for Recognition of Residential Windows in the Energy Star "Most Efficient" Program ("Most Efficient Program" or "Program").

As indicated previously, PNA is in agreement with the U-value specified by EPA in the Most Efficient Program criteria.

We applaud EPA's decisions to delete VT and add a minimum SHGC to the Most Efficient Program criteria.

Our only remaining concern is that, while a minimum 0.20 SHGC will eliminate some dark and tinted glass from the Program, the choice of such glass has, historically, been left to the homeowner as largely a matter of aesthetics, not energy conservation. To have an impact on energy conservation, which is the primary objective of the Program, a minimum SHGC of 0.30 or 0.35 should be considered as the Northern Zone criteria.



PNA sincerely hopes that the inclusion of 0.20 minimum SHGC in the Most Efficient Program is not intended to satisfy or be in lieu of the demonstrated need for a minimum 0.35 SHGC, or a more robust system of trade-offs, in the Northern Zone of the underlying ENERGY STAR Windows Program. Having said that, PNA stands ready to assist EPA in the development and implementation of credible Energy Star Programs, including the Most Efficient Program.

Best regards,

A handwritten signature in blue ink, appearing to read "CLaFayette".

Connie K. LaFayette
Business Development Manager – Architectural Glass
NSG Group | Pilkington North America, Inc.