



Via Electronic Submission

October 12, 2012

Doug Anderson
ENERGY STAR Home Improvement Program
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Subject: ENERGY STAR Most Efficient program – 2013 Recognition Criteria for Residential Windows

Dear Doug:

The Window and Door Manufacturers Association (WDMA) would like to provide the following comments for consideration by EPA on the proposed ENERGY STAR Most Efficient 2013 Recognition Criteria for Residential Windows.

WDMA appreciates the opportunity to provide our comments as WDMA members have long been strong supporters of the ENERGY STAR program and have substantially contributed to the success of the ENERGY STAR brand in the window, door and skylight market.

In commenting on the proposed ENERGY STAR's Most Efficient criteria for recognizing top performing windows, we would like to re-emphasize that our evaluation and recommendations on any proposed ENERGY STAR fenestration criteria, as we have stated in previous comments, are based on several guiding principles that WDMA strongly believes are critical to the effectiveness of the ENERGY STAR windows, doors and skylights program in-line with the guiding principles of the ENERGY STAR program as a whole.

Specifically:

- Improving the energy efficiency of existing homes, particularly the replacement of the existing stock of single-pane windows, skylights (including converting plastic to glass) and glass doors with energy efficient products represents one of the greatest opportunities for reducing residential energy use in North America. The ENERGY STAR windows, doors, and skylights program should play a critical role in achieving that objective.
- Revisions to existing program requirements and the development of new program criteria such as for Most Efficient products, must not undermine the reasonable affordability or availability of ENERGY STAR fenestration products which is critically important to consumers in their decision to purchase them.

With respect to the proposed 2013 ENERGY STAR Most Efficient Recognition Criteria for Residential Windows we offer the following:

- 1) We concur with and fully support Most Efficient Recognition Criteria 1. Most Efficient product eligibility should be limited only to those products that have first fully qualified with the ENERGY STAR Program Requirements Eligibility Criteria for Windows Version 5.0.

- 2) We also concur and fully support Recognition Criteria 2 to require certification to the North American Fenestration Standard/Specification (NAFS). We believe that requiring NAFS certification is essential to ensuring EPA's Most Efficient recognition principal of "No compromise in performance" is met by all "Most Efficient" qualified products.
- 3) Proposed Recognition Criteria 3:

U-Factor: We are concerned by EPA's promotion of a 0.20 U-Factor in any climate zone other than the Northern Zone.

We believe the proposed Most Efficient U-factor of 0.20 for all zones sets a bar that greatly surpasses what is necessary to meet EPA's stated Most Efficient recognition principal of "Truly exceptional efficiency performance", especially in relation to the current Version 5.0 windows criteria and the 10% percent market share target for Most Efficient products. We believe market availability of products meeting the proposed criteria is and would remain extremely limited throughout the US, in large part due product costs that do not or would not provide what many consumers and builders consider to be a reasonable payback based on the gains in home energy efficiency. In addition, given the short "shelf life" duration of the Most Efficient listing, there will likely be little improvement in market availability or affordability of Most Efficient products as proposed.

We also believe that a single, exceptionally stringent U-factor for all four zones is inconsistent with providing the best guidance for consumers to identify "truly exceptional" products that are the best choice for them, and that consumers should not be left with a void for doing so. We believe the significant difference between the proposed Most Efficient criteria and Version 5.0 windows criteria creates such a void and undermines the intent of the Most Efficient program.

With those concerns in mind, we are recommending the following U-factors:

- Northern Zone – 0.20
- North-Central Zone – 0.22
- South-Central Zone – 0.25
- Southern Zone – 0.30

We believe the U-factor criteria recommended above still fully meets the Most Efficient recognition principal of "truly exceptional efficiency" and will serve as a better market driver as well as provide consumers with better and more varied exceptionally efficient options. More importantly, the U-factor criteria we are recommending is more consistent and in-line with Version 5.0 criteria thereby also providing consumers and builders with much better guidance for identifying and selecting the right windows with exceptional energy efficiency performance that in addition, are more affordable and provide a better payback.

SHGC: While the SGHC criteria seems reasonable, we would like a better understanding of why EPA is not proposing a SHGC in the South Central and Southern Zones at the 0.25 level required by the 2012 IECC.

Visible Transmittance: We believe the initial focus of the Most Efficient category should be on U-Factor and SHGC and not be complicated by overlaying a Visible Transmittance (VT) requirement. We recommend that VT not be included in the qualification criteria.

We understand the concern over the potential for the use of “dark glass” to meet the SHGC criteria and thus reducing beneficial daylighting. However, we believe adequate control for preventing this is already in place and will continue to be provided by consumer preferences and manufacturers’ understanding of them. Furthermore, there is no ideal “one size” VT and a minimum VT of 0.40 is too high for any zone. For some products, a VT lower than 0.40 results from the addition of grids for instance, or because of frame or sash characteristics, but the windows still provide adequate daylight that is acceptable to consumers and for alleviating the need for artificial light. Furthermore, undesirable glare can still result with VT’s of 0.40 and lower. In instances where glare could be a problem, a VT lower than 0.40 may be desired or necessary. We are therefore recommending no VT requirement be included in the criteria for these reasons. Instead, we recommend the Agency evaluate the VT of the products that qualify under this initial set of Most Efficient criteria over the first year and, if critical, recommend a VT requirement at a later point in the program.

Finally, with respect to the Recognition Period, we believe the proposed limit of one-year maximum is too short. While this may be minimally adequate for the limited products that may already meet the Most Efficient criteria and are already ENERGY STAR qualified, it is simply too short a Recognition Period to move the market otherwise. As we have commented in the past in response to proposed changes to the Version 5.0 criteria, manufacturers need adequate time for product development and preparing marketing plans, and adequate time to recoup associated costs in order to participate in the program. One year does not provide for that. We therefore recommend a minimum Recognition Period of 3-4 years.

We greatly appreciate this opportunity to provide our comments and welcome the opportunity to discuss them further with you prior to the Agency’s finalizing the criteria.

Please let me know if you have any questions on any of the matters raised in our comments.

Sincerely,



Jeffrey T. Inks
Vice President, Code and Regulatory Affairs

cc: WDMA Exterior Products Code Committee
WDMA Regulatory Affairs Steering Committee